

Appendix Q

Communications from Individuals and Other Sources

Q. Communications from Individuals and Other Sources

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COMMUNICATION NUMBER 136919

Lolly Andrews

From: Website User
Sent: Tuesday, October 18, 2011 2:09 PM
To: arcticrefugeccp@fws.gov
Subject: Comments from Individual
Withhold my info: no
Prefix: none
First Name: Lolly
Last Name: Andrews
Suffix: none
Title:
Address 1: 1411 Early View Dr.
Address 2:
City: Anchorage
State: AK
Postal Code: 99504
Country: USA
Additional Info:

Comment: The following are my comments on the Arctic Refuge, CCP. **[136919.001 NEPA Process -- Scoping]** The scoping comments were poorly summarized and did not represent what we said. I hope this process is better.

First, I support Alternative E. I support goals 1 and 2. Most important is that natural processes must be maintained. Wilderness values should be fully protected. **[136919.002 Wildlife -- Hunting Effects]** Trophy hunting and its effects on genetics should be included as an issue to be addressed for this reason. Predator control and intensive management must be prohibited, so I support Management Guidelines 2.4.12 and 2.4.12.7 for this reason. I also support Management Guideline 2.4.11 specifying that habitats must remain wild, uncontrolled, and not manipulated. **[136919.003 Refuge Vision and Goals -- General]** Protecting wilderness is most important, so there should be an objective specifying that.

[136919.004 Consultation and Coordination -- State Coordination] A serious shortcoming of the plan that needs to be corrected relates to the sections that discuss cooperation with the state of Alaska and/or ADF&G. To be accurate, these sections must recognize that the state interests often conflict with refuge purposes, and in such cases the refuge must prevail and the state or ADF&G must be preempted.

I support the climate change guideline that says that natural systems will be allowed to adapt to change and that FWS will not intervene.

I support Goal 5, recreation, as it is, and the objectives recognizing the importance of adventure, challenge, freedom and independence. **[136919.005 Alternatives - Issues Considered but Eliminated -- Visitor Use Issues]** Several recreational issues should be resolved by this plan and it is unfortunate that the public's wishes to address them were not acted on. These include the need to limit group size (to about 8), provide preference for private users over commercial, the general need to restrict commercial guides, the restriction of using airplanes for game spotting, preventing airplane landing impacts, and the need to establish a commercial and mechanized zone around the Firth River area. Also, remove all buildings.

I like all the "Special Values" of the refuge as described, and hope they will all be maintained.

Email: [REDACTED]

COMMUNICATION NUMBER 136789
Bob Childers, Executive Director
Gwich'in Steering Committee

From: Bob Childers
Date: November 15, 2011 4:59:36 PM AKST
To: ArcticRefugeCCP@fws.gov
Subject: Gwich'in Steering Committee comments

Thank you-
Bob Childers, Executive Director
Gwich'in Steering Committee

Attachment:

Comments on

Arctic National Wildlife Refuge–
Draft Comprehensive Conservation Plan
15 November 2011

General comments:

1. We are especially pleased that the Arctic Refuge CCP has addressed the long standing issue of Wilderness protection for the Coastal Plain. Porcupine caribou cows depend on the narrow Coastal Plain of the Arctic Refuge to give birth, nurse and raise their calves. It is central to Gwich'in culture and life.
2. We are also very pleased to see the Refuge Vision Statement acknowledges that the Arctic National Wildlife Refuge as a place where "...traditional cultures thrive with the seasons and changing times," and that the document also recognizes the mixed subsistence-cash economies of our communities. The sustainability of our communities and our culture is the first responsibility of every Gwich'in Chief. This has been our homeland since before time, and it will be our home forever.

[136789.001 Refuge Vision and Goals -- Goal 1 (including objectives)] In Alaska the lives of the Gwich'in are closely tied to the management of the Arctic and Yukon Flats National Wildlife Refuges, and the CCP is central to that management.

Unfortunately this plan is not designed with the future of the Gwich'in in mind. It is hostile to Gwich'in ways of management and respect for people. We fought hard to protect these lands as refuges in 1979 and 1980, and we defended them in court more than once. This was the best way to control industrial development and protect the land. But we still live here and will depend on Refuge resources far into the future. We know how to protect this country and how to use it.

We strongly recommend that you revise your plan to rely on traditional management of subsistence uses of refuge lands to the maximum extent possible.

The approach of this plan is to manage by defining too many rules for anyone to understand or care about. It uses a system of special use permits and reporting that serves

no real management purpose, will not provide useable information, and is designed to ensure non-compliance. It doesn't do anything except make people mad.

[136789.002 Refuge Management Policies/Guidelines -- Compatibility Determinations (includes Appendix G)] One good example is the Draft Compatibility Determination for Subsistence Harvest of House Logs (p. G99-G105,) which also applies to firewood in some cases, apparently. These guidelines are overly specific and not practical or helpful for someone who knows the country. Different stands of trees vary from place to place, and every site is different up here. The rules you propose are too prescriptive for the environment, and the proposed system of permits and reports are entirely unnecessary and inappropriate for the culture you seek to impose them on. In some cases refuge rules are more damaging to the environment than traditional practices. A Gwich'in looking for several logs for firewood would go upriver by snowmachine until he found trees on an undercut bank that would wash away in Spring anyway, and take those. FWS regulations would have him go up the river somewhere, then up the bank and make a trail back 50 feet to cut perfectly good trees with a long life ahead of them. It is more dangerous, more damaging to the environment and harder on the machine. That is not the way we do things.

We advise you can simply trust the people who are cutting wood to know what they are doing. We have watched the trees here for many generations. We see our forefathers' stone-axe cut stumps throughout the forest, but there is no problem. We might not do it exactly like the person who wrote these proposed regulations, but we will do as good or better job that pays attention to the particular place we are. We won't take any more trees, or fewer trees, than we would anyway. We will do it respectfully for the trees and the land, and there is no need to know exactly where they came from.

This move to greater co-operation in subsistence management is needed to avoid unnecessary mis-understandings and conflicts. It will not change anything we do on-the-ground, and it will save you some money.

3. **[136789.003 Refuge Management Policies/Guidelines -- General]** The Plan does not recognize the significance of Refuge management decisions on the economies of our communities. When the Yukon Flats Refuge office left Ft Yukon many years ago it really hurt the local community. Now the Arctic and Yukon Flats National Wildlife Refuges are two of only a very few refuges that are not managed locally.

-- We recommend that this plan include a move of the Arctic Refuge offices from Fairbanks to Ft Yukon within 5-7 years; and

-- We recommend that this plan identify all future studies, conservation and other Refuge activities that could be evaluated for contracting to tribal entities for local management and execution.

4. **[136789.004 Refuge Infrastructure and Administration -- General] [Preamble 136789.005]** We are concerned that the plan contemplates a very large increase in the Refuge budget, but a decrease in funding may be more realistic. We believe the plan should identify priority activities that address the most important refuge issues, and also those that could be delayed, in the event of a significant decrease in existing funding. Otherwise, we will not know what you plan to really do.

[136789.005 Cultural and Historical Resources -- Cultural Resources] For example, archeological plans and research could be postponed until a qualified Gwich'in professional was available to undertake them. This would delay these costs for some years (except for

emergency archeological salvage,) and contribute to the economic viability of Gwich'in. In addition the work would benefit from the researcher having access to tribal knowledge and a wider cultural context that would not be available to a non-Gwich'in researcher. Any funds available for cultural research at this point in time should be considered for granting to Gwich'in efforts at collecting the knowledge of our elders. That is the most urgent need, and will be the basis for understanding many cultural issues in the future.

The Alternatives and Wilderness

1. The Gwich'in Steering Committee believes Alternative C best represents the priorities of our people.

The coastal plain of the Arctic National Wildlife Refuge is the most important habitat for Porcupine caribou, which are central to Gwich'in culture and life. We call this place Izhik Gwats'an Gwandaii Goodlit - the Sacred Place Where Life Begins. Oil development here would hurt the productivity of the caribou by displacing them from key birthing and nursery grounds, and threaten the future of our people. Biologists believe this would be the result even if they do everything right; it is not the result of a spill or some other industrial accident. We believe we have a right to continue our way of life, and that right is guaranteed by the International Covenants on Human Rights, the first Article of which reads in part: "In no case may a people be deprived of their own means of subsistence."

2. **[136789.006 Refuge Vision and Goals -- Goal 7 (including objectives)]** We insist that the drainages of the East Fork Chandalar, Christian and Sheenjek Rivers are not suitable for Wilderness.

The Draft emphasizes current activities as the benchmark, but we must be concerned about the future sustainability of our communities. Wilderness suitability may affect logging and housebuilding, our hopes of repopulating Christian Village, the construction of trapping cabins and the viability of trapping, or the viability of small enterprises in our area or on our allotments, or the evaluation of a small hydro site below Arctic that may one day be economic, displacing diesel. Some day we might say ok - we will not need this area or that, but it is too soon to know now. You should come back in one or two generations and ask again.

Other

1. **[136789.007 Refuge management policies/guidelines -- Land Exchanges]** We strongly object to the purchase of Allotments. We recommend the FWS work with a Gwich'in Land Trust or tribal entity to funnel available funds to allow allotments to remain in tribal ownership.
2. **[136789.008 Environmental Justice -- Effects of Alternatives]** Correction: The Gwich'in Niintsyaa Resolution addresses Wilderness only for the Coastal Plain of the Arctic Refuge. Other portions of the Refuge have never been considered in these discussions. Please correct at P. 5-93 and elsewhere.
3. **[136789.009 Wild and Scenic Rivers -- Suitability (includes Appendix I)]** Correction: Native Village of Venetie Tribal Gov't holds title to the subsurface of E. Fk. Chandalar River to the middle of main channel. Please correct discussion at p. SUI-43
4. **[136789.010 Wild and Scenic Rivers -- Suitability (includes Appendix I)]** Discussion of caribou fence at SUI-38 - please indicate "Kutchin" is archaic word for "Gwich'in". Reader should be informed those are our fences.

COMMUNICATION NUMBER 32637**Peter Fontaine**

September 26, 2011

Sharon Seim

U.S. Fish and Wildlife Service-Arctic NWR

101 12th Ave, Room 236

Fairbanks, AK 99701

Dear Ms. Seim:

I am writing to you at this time to urge you to support the wilderness additions and policy recommendations in the Comprehensive Conservation Plan of the Arctic National Wildlife Refuge. I do this because during the month of August, as autumn began in the Arctic, I was fortunate to be part of a Sierra Club expedition that spent twelve days backpacking the Refuge. From my own observation and experience, I believe this wilderness must have all the protection possible to safeguard its landscape, its species, and its ecosystem.

From the first day along the Atigun River to the Sagavanirktok Valley and through all the peaks, valleys, tundra, rivers, streams, and glaciers that marked our 50 mile journey, I experienced a wilderness unlike any I have ever known, even with all my years since elementary school of hiking in the Pacific Northwest. The Arctic Refuge, brilliant with autumn color, was a soul-filling landscape of raw, pure, open wilderness. As our group of seven hiked the ever-changing topography of the tundra, climbed difficult passes, drank from icy rivers, felt the walls of glaciers, reclined on the moss and lichen, looked out over a vast array of peaks, observed the caribou, Dall's sheep, Arctic ground squirrels and ermine, saw the tracks of wolf and bear, watched the moon make its daily course around us-we listened to the silence and felt the immensity and power of the wild land around us.

This land must not be destroyed by the industries which seek to exploit it. It must not be allowed to fall victim to the contamination and degradation that come in the wake of human development. For the length of the Dalton Highway that we traveled, the oil pipeline hugged the landscape like a silvery sinister presence, terminating in the mechanization, pollution, and landscape-scarring reality of Prudhoe Bay. The Refuge must not suffer the same fate. It must be kept whole, intact, untouched, and inviolate. To quote Theodore Roosevelt's statement about the Grand canyon-"Leave it as it is. You cannot improve on it. The ages have been at work on it, and man can only mar it."

I urge you to approve wilderness designation for the entire coastal plain and other lands thus far undesignated, which are integral parts of the Arctic ecosystem. Also, the plan must oppose any oil and gas leasing, exploration, or development. The Arctic Refuge, for all its size and powerful forces of nature, cannot withstand the invasion of an oil, gas, or mining industry that would leave nothing but contamination, destruction, and commercialization in its wake, and another irreplaceable wilderness would be lost forever.

[Preamble 32637.002, 003, 004] Additionally, the plan must include: **[32637.001 Refuge Management Policies/Guidelines -- General]** recognition that the flora and fauna found in the Refuge are valuable species, and must be left unmolested in their natural state. (I personally would oppose hunting in the Refuge, but that seems to have been a compromise made at the time of its establishment); **[32637.002 Wildlife -- Predator Control]** There must be a prohibition against any program of predator control, which destroys the balance of ecosystems, as we have

seen in the lower 48; [32637.003 Refuge Management Policies/Guidelines -- General] Indigenous peoples must be able to maintain their connection to the landscape, and that requires an intact, unspoiled landscape; [32637.004 Recreation and Visitor Use -- Visitor Use] The Refuge must be kept as real wilderness - with an emphasis on challenge, exploration, discovery, solitude, self-reliance and adventure, not a highly promoted amusement park. This would mean no easy access or motorized public access, no "improvements", no flight-seeing, no game spotting in planes, no competitive events, and a limit on group size.

Lastly, [32637.005 Recreation and Visitor Use -- General] emphasis needs to be placed on a leave no trace, no impact ethic within the Refuge, and education toward the importance of the Refuge as a unique, whole, undisturbed world. It must not be promoted as a recreational Mecca, and USFWS should administer it as non-intrusively as possible.

Your agency has the opportunity to oversee this wilderness the right way - to avoid what has happened to other wilderness areas spoiled by too much human incursion. Protect the Arctic National Wildlife Refuge from the greedy and abusive forces of industry that seek to pillage it, and then leave it alone. Leave it for those who seek to know its beauty, grandeur, and power quietly and with respect.

Sincerely,

Peter J. Fontaine

4010 Ashworth Avenue North
Seattle, WA 98103
[REDACTED]

COMMUNICATION NUMBER 136807**Duane Howe**

From: "Lani Raymond"

To:

Subject: Emailing: USF&WS final draft

U.S. Fish and Wildlife Service

Arctic NWR-Sharon Seim

Fairbanks AK 99701

[Preamble 136807.002, 003, 004, 005, 006, 007, 008, 009] Following are my comments of the Arctic National Wildlife Refuge CCP:

1. I'm glad to see that Olaus and Mardy Murie's observations made over 50 years ago on Alaska's North Slope by sled dog were recognized. They strongly recommended that the North Slope should one day be protected as wilderness. They, along with many of us, would be very pleased if that were to finally become a reality.
2. I support Alternative E for the Arctic National Wildlife Refuge.
3. **[136807.001 Consultation and Coordination -- State Coordination]** The Alaska Fish and Game department, which one might assume should be interested in managing the wildlife of the refuge, is presently more interested in predator control. At some future date the department may become more interested in true wildlife management and might then become more interested. At the present time, Alternative E would not seem to be a fitting role for them.
4. The Arctic National Wildlife Refuge is far more valuable at the present time for wildlife protection than for the production of oil and gas. Oil and gas are becoming a more and more important cause of global warming.
5. It appears that there will soon be a push to actually increase the production of a different form of oil by drilling many more wells on the North Slope. If this is true, it seems that there will be a need to decrease the number of producing wells in order to cut down global warming.
6. **[136807.002 Refuge Management Policies/Guidelines -- Public Access and Transportation Management]** Do not allow further overuse of certain areas of the refuge. The overuse that has occurred in the past must be corrected with a public use management plan.
7. Oil and gas drilling must not be allowed anywhere in the vicinity of the refuge where it can add any increased loss of the wilderness character of the refuge.
8. **[136807.003 Recreation and Visitor Use -- Impacts of recreation on other resources]** Trails must be properly designed in order to prevent improper changes in their directions and making new trails by attempting to make long trails shorter.
9. Alaskans are accustomed to using ATV vehicles to travel widely for hunting, fishing or anything else. It may become necessary to explain to these ATV enthusiasts why it is necessary that they cannot be used in this refuge.
10. No commercial enterprise should be allowed to operate in the wilderness.

11. Wilderness travelers should be made aware that they will not find any conveniences or protections from weather or storms other than those provided by them selves.
12. Large groups planning trips during busy times in the refuge may need to be warned they need to plan ahead for their trips.
13. **[136807.004 Recreation and Visitor Use -- Commercial Operations, General]** The numbers of outfitters should be limited. No one should be required to hire an outfitter to travel in the wilderness unless they are not confident that they can keep from getting lost. Will anyone be available to find travelers that get lost? Wilderness travelers should file travel plans including when they plan to return.
14. All outfitters, hunters and fishermen must show a mutual concern and respect for the well being of all fish and wildlife or risk being removed from the wilderness or refuge.
15. **[136807.005 Recreation and Visitor Use -- Guided Hunting and Fishing]** Popular fishing sights should not be allowed to become over fished. Wilderness is not a place for combat fishing.
16. Do not allow camping sights along fishing streams to become overused and degraded.
17. **[136807.006 Wildlife -- Hunting]** 17 Trophy hunting of Dall Sheep should be limited only to rams designated by biologists.
18. **[136807.007 Refuge Infrastructure and Administration -- Administrative Sites]** Administrative buildings should remain in place only where they do not detract from the wilderness character of the land.
19. **[136807.008 Transportation and Access -- Mode of Transportation]** Airplane and helicopter landing sites should be located early in order to prevent them from being moved more closely later in the process and reducing the wilderness character of the refuge. Landing sites should not be allowed inside the refuge. Where such sites were grandfathered in wilderness in other areas the only users to benefit from their use were those flying the airplanes.
20. **[136807.009 Recreation and Visitor Use -- Impacts of recreation (waste)]** Management of human waste can become an undesirable issue if it is not dealt with. Rules should be established early and followed up on before they are allowed to become problems. Small digging tools can be carried easily in backpacks and work well.
21. Local natives could be used to help guide visitors through the refuge and teach them how to hunt and fish. Natives also could teach about the history and wildlife of the area as well as the history of their own people. It could be a win-win situation for all.

Thank you for the opportunity to contribute to this EIS.

Duane Howe
41640 Gladys Court
Homer, Alaska

COMMUNICATION NUMBER 32621
Karen Jettmar, Wilderness Guide/Director
Equinox Wilderness Expeditions

From: Karen Jettmar/Equinox
To: ArcticRefugeCCP@fws.gov
Subject: comments on CCP and WSR Study

Karen Jettmar
Equinox Wilderness Expeditions
2440 E. Tudor Rd. #1102
Anchorage, AK 99507
www.equinoxexpeditions.com
Ph: 206-462-5246

- WSR_recommendations.doc

Attachment:

Equinox Wilderness Expeditions
2440 E. Tudor Road #1102 • Anchorage, Alaska • 99507 • (206) 462-5246 •
info@equinoxexpeditions.com
November 15, 2011

Sharon Seim, CCP Planner
Arctic National Wildlife Refuge
101 12th Avenue, Room 236
Fairbanks, AK 99701

Dear Arctic Refuge Planners:

I am currently out of the country and have not received any written communication by post from USFWS for several months. I am submitting my comments on the CCP here. I just learned today that the stakeholder comment period for the Wild and Scenic River review closed on November 12th. I hope you will accept my stakeholder comments today in light of my absence.

As a wilderness guide and director of Equinox Wilderness Expeditions, a commercial adventure travel company that offers trips on rivers, wilderness, and wildlands in the Arctic Refuge, I have traversed much of the Arctic Refuge. I support Alternative E in the Comprehensive Conservation Plan that would recommend Wilderness designation for the three study areas, adding them to the existing Wilderness areas of the Arctic Refuge. Wilderness designation would provide the strongest possible protection for the Refuge, while allowing for subsistence activities.

I support the plan's Arctic Refuge Vision Statement and Goals that aim to protect the Special Values of the Arctic Refuge described in the plan. Overall, the entire 19-million acres that make up our nation's largest, wildest refuge should be managed in a manner that leaves its natural biodiversity, ecological processes, Wilderness and Special Values intact for now and all time.

I have traveled many of the rivers in the refuge, some of them many times over the course of the past 24 years. **[32621.001 Wild and Scenic Rivers -- Eligibility (includes Appendix I)]** In earlier

comments to USFWS regarding rivers, I recommended consideration of all 160 Arctic Refuge rivers. I have personally found the 160 rivers to be free-flowing, have pure, high quality water, and contain one or more Outstanding Remarkable Values for their scenic, recreational, geologic, historic, cultural, fish, wildlife, wilderness and intact ecological systems at the landscape scale, and therefore should be inventoried and considered as eligible rivers. I am, therefore, disappointed to see that only ten segments are considered eligible. I certainly hope that this is not the only chance to evaluate wild rivers, for there are many other rivers that are both eligible and suitable. Let this be a consideration of what USFWS considers to be high priority rivers, and in future CCP planning, I request that other rivers be considered, since the Arctic Refuge was set aside to protect Wilderness.

WSR status for many of the Refuge Rivers would assure protection of refuge watersheds as well as the coastal barrier islands and associated waters.

I believe all of the eligible rivers should be recommended for Wild River status and I would like to see Alternative E revised to include all of the ten rivers USFWS found eligible for this study.

[Preamble 32621.002] Marsh Fork Canning: The Marsh Fork has outstanding geology in its upper reaches. Beautiful swirling bands of uplifted rock adorn the upper river, and there is a wonderful collection of erratic boulders near the currently used upper Marsh Fork landing strip beside the river. Fossilized marine rocks also offer fascinating geology. The upper Marsh Fork is extremely scenic as well. While not having the dramatic glaciated peaks of the Hulahula, the upper river has steep rugged peaks that are highly scenic. Dall sheep are easily viewed; the area is known for its nesting gray-headed chickadees. The fact that hunters access the Marsh Fork shows that the area is special for its wildlife. As for recreation the large aufeis field that develops on the Marsh Fork/Canning confluence is of interest to visitors. I personally have found the Marsh Fork to have fun, challenging whitewater that travels through a scenic canyon of great geological interest. **[32621.002 Wild and Scenic Rivers -- Marsh Fork Canning River]** I believe it is especially important to designate the river for the protection of grey-headed chickadee (Siberian Tit) breeding and nesting habitat.

Canning River: The Canning River is an especially important area for wildlife, and it is possible to paddle all the way to the ocean on the Canning; the coast is an important area for caribou. Muskoxen preferred area; I've seen 40 muskoxen along the river in summer; more than 80 in April.

East Fork - Chandalar River

The upper East Fork is very wild, and we have never seen any other people on the river except locals at fishing/hunting camps. I have also gone upriver with Gwich'in friends from Arctic Village; the impact of villagers on the river is very minimal. There is no longer a sport hunting guide operation there, and the area is recovering from that activity. I was actually on the airstrip on Sheep Creek in July, and had a chance to walk around thoroughly to see the old impact. There is not much sign of human activity now, other than the runway. The silver-tan mountains are striking geologically, and different from the Sheenjek or Hulahula. There are Dall sheep in the mountains, and lots of moose and waterfowl use the surrounding wetlands. The upper East Fork is an important caribou migration corridor.

[Preamble 32621.003] Hulahula River This river has it all, wilderness, geology, scenery, wildlife, fish, recreation, solitude, intact wilderness. The dramatic peaks of Chamberlin and Michelson that flank the river make this a world-class experience. Several times on the river, I've seen wolverine, and several times have encountered tens of thousands of caribou, not to mention other wildlife. The coastal plain portion is amazing, with good hiking all the way down the river to the coast, the

coastal dunes and river delta offer birding and wildlife as well. Despite the presence of Native allotments, the Hulahula has strong cultural value to the Inupiat. **[32621.003 Wild and Scenic Rivers -- Hulahula River]** WSR designation would ensure protection of subsistence resources, and would also assure that Native allotments maintain uses that are harmonious with Arctic Refuge purposes.

Jago River - The Jago has wonderful and challenging whitewater, caribou migration and core calving area in the spring/summer. I've seen wolves, lots of bears. I find the scenery outstanding with Mts. Hubley and Waw. The McCall Glacier has scientific interest and it is an amazing accessible hike. It is very special to walk or paddle the river and reach the foothills to look back at the mountains and out towards the coastal plain. Inspiring. Also, there are rough-legged hawks on Bitty. One of my finest experiences in life was standing on Bitty and looking out at the coastal plain and mountains, then hiking down the river across the coastal plain, with caribou all around, by the thousands. This view should be preserved forever.

[32621.004 Wild and Scenic Rivers -- Kongakut River] Kongakut River - Since this river is entirely in designated wilderness, it should be considered for WSR status. I have personally been on the river more than 2 dozen times, and absolutely love the river for scenic, wildlife, recreation, fishing, and intact wilderness. Especially interesting is the ability to travel from mountains to sea and experience a variety of ecosystems, all the way out to the river's delta, and Icy Reef. To me, this experience is the quintessential Arctic Refuge: to experience mountains, alpine tundra, coastal plain, coastal estuary, and barrier islands. The river is a migration corridor for the Porcupine caribou herd most years, and traditionally, there have been wolf packs utilizing the river. Dall sheep thrive in the valley. For three years in a row we have observed a wolf family. The coastal plain is essential for caribou migration and staging for white-fronted geese. Arctic char fishing can be superb. The intrusion of balsam poplar far north on the Kongakut and side tributaries indicates warmer microclimates that are indicative of a warming climate.

[Preamble 32621.005] Okpilak River – Very much deserving of WSR status. I spent 10 days on this river and it is the most difficult whitewater river and the most inaccessible river in the refuge. I like this. It takes a certain amount of fortitude to get there and once there, you have the place to yourself. **[32621.005 Wild and Scenic Rivers -- Other Rivers]** The hot springs should be a National Natural Landmark. They attract Dall sheep and a verdant oasis seen in few places in the refuge. The area will attract hikers and even paddlers, and will gain more use over time despite the difficult whitewater. Kaktovik residents access the Okpilak during periods of snow cover, and the area undoubtedly gets more use then than in summer. I would say it's the most beautiful view from a hot springs anywhere in North America. Very important coastal plain area for caribou migration and staging for white-fronted geese.

[Preamble 32621.006, 007] Neruokpuk Lakes -The historical perspective is important, along with the unique geology (largest lakes in the refuge, and outstanding example of post-glacial scenery. Waterfowl — important area. **[32621.006 Refuge Infrastructure and Administration -- Administrative Sites]** I recommend removal of any structures (if this has not been done already), and then the area will be completely intact wilderness. Outstanding scenery, with its access and views of Mt. Chamberlin — an amazing place to spend time on a plateau that lies above the arctic coastal plain. **[32621.007 Wild and Scenic Rivers -- Other Rivers]** I recommend WSR river designation.

[32621.008 Wild and Scenic Rivers -- Other Rivers] Porcupine River- As a trans-boundary river and migration corridor for fish and wildlife, the Porcupine is clearly worthy of WSR protection.

The Gwich'in culture is an important part of this river and the communication and visiting between Alaskan Gwich'in villages and Yukon Gwich'in villages is important

Atigun River: This river is important for its qualities: Recreation, Scenery, Geology, Wildlife, Intact Wilderness. The Atigun is the most accessible of the Arctic Refuge's wild rivers. It is an important river for recreational users, for its challenging whitewater and scenic beauty, as well as the fact that even though it is accessible off the Haul Road, it is still an intact wilderness and the feel of a very remote wilderness. Despite the nearness of the Haul Road, it is still a remote wilderness.

In conclusion, I recommend that all of the ten rivers found eligible for this study be recommended for inclusion in the WSR System. In future years, I recommend that other refuge rivers be considered for inclusion. As our finest wilderness refuge, all refuge rivers are worthy of WSR designation.

Sincerely,

Karen Jettmar

COMMUNICATION NUMBER 32622**Frank & Jennifer Keim**

Attachment:

Dear Richard Voss and Sharon Seim:

In the words of Wallace Stegner:

“What I want to speak for is not so much wilderness uses, valuable as those are, but the wilderness idea.... Being an intangible and spiritual resource, it will seem mystical to the practical minded – but then anything that cannot be moved by a bulldozer is likely to seem mystical to them.

Something will have gone out of us as a people if we ever let the remaining wilderness be destroyed. We need wilderness preserved – as much of it as is still left. The reminder and the reassurance that it is still there is good for our spiritual health.... It is good for us when we are young, because of the incomparable sanity it can bring...into our insane lives. It is important to us when we are old simply because it is there.”

Comment:

As a 50-year resident of Alaska and 18-time hiker and floater of the Arctic National Wildlife Refuge, I feel this qualifies me to comment on the Refuge CCP.

I believe the Arctic Refuge needs the greatest Wilderness protection afforded by the law, common sense, and the wisdom of hindsight.

Common sense and hindsight tells me that wilderness lands are so quickly disappearing everywhere in the world that it is extremely important we set aside as many of these as possible as soon as possible with the strongest possible protections for them.

In spite of today’s petty politics, there is nothing in the law (ANILCA, etc.) that prevents you from recommending Wilderness and Wild and Scenic River status for much more land and water in the Arctic Refuge than is presently designated as such.

Therefore, I am in favor of Alternative E because it provides maximum protection for the greatest amount of land and water in the Arctic Refuge.

In favoring Alternative E, I also feel it is important to assure the following:

- [32622.001 Wildlife -- Predator Control] The most important purpose of the Refuge is to conserve the natural diversity of the area and this purpose should never be compromised by any consideration to allow predator control or habitat manipulation to increase game species for human harvest. The plan needs to assure that when in conflict with the State of Alaska, the above Refuge purposes are paramount.
- [32622.002 Refuge Management Policies/Guidelines -- General] The Special Values of the Arctic Refuge section should guide all future management decisions.
- [32622.003 Recreation and Visitor Use -- Visitor Experience] In providing for wilderness recreation, the USFWS should allow opportunities for visitors to experience adventure, challenge, solitude, independence and freedom with minimal interference.
- [32622.004 Recreation and Visitor Use -- Visitor Use] This does not mean that the Refuge be deluged by visitors without regulation of their numbers and whereabouts, especially for commercially guided trips. In the final plan, there should be a commitment to address valid public concerns of visitor use and wilderness stewardship.

- [32622.005 Climate and Climate Change -- General Impacts] In addressing climate change, the plan should allow natural systems to evolve and adapt, without intervention.

Thank you.

Frank J. Keim
2220 Penrose Lane
Fairbanks, Alaska 99709
[REDACTED]

Post Script:

Please include my wife Jennifer Allison-Keim as a proponent of the above. She has done four long-distance treks with me in the Arctic Refuge.

Addendum: [32622.006 NEPA Process -- General] The record of comments taken during the 2010 scoping stage of the CCP indicates I was not included as a supporter of further Wilderness designation on the Arctic Refuge. This lack of veracity on the part of some within the USFWS concerns me greatly. Please read my appended Scoping Comments carefully to see that I do indeed favor the designation of the greatest amount of Wilderness possible and that the largest number of rivers possible in the Refuge be set aside as Wild and Scenic Rivers.

Arctic National Wildlife Refuge 2010 CCP Scoping Comments

I am a 49 year resident of Alaska, and I have been up to the Arctic Refuge on extended trips almost as many times as I have fingers and toes. I value the Arctic Refuge for the unique and wonderful Arctic ecosystem that it is, and I have lobbied many times in Washington, D.C. to keep it intact and free from exploitation by oil interests. I have also valued the opportunities I've found there to explore some of its countless river valleys and mountain tops and to observe its myriad wildlife, including mammals large and small and the more than 100 species of birds that nest there during the warmer months. I've also enjoyed the rich geology of the area and the profusion of wildflowers during the spring. Most of all, I have appreciated the wildness of the area, made possible only because much of it was designated as Wilderness. Although it is not perfect wilderness, since hunting is allowed in most of the area, and because there are too many overflights in some valleys and too many people allowed to float some rivers, it is one that has allowed me to experience solitude and also to gain a sense of independence, personal freedom and adventure, if only for short two-three week periods. With all of this in mind, I would like to see the following considerations incorporated in the new stewardship plan:

1. Preserving the wilderness character of the entire Arctic Refuge, including the designated Wilderness in the Refuge, should be the primary standard for all agency actions, public uses and technologies used there.
2. Stewardship of the Refuge should be more visionary than reactive, i.e., anticipating and preventing future threats.
3. The non-degradation principle should apply to the entire Refuge, i.e., no actions should be taken that detract from the Refuge's current wilderness character. This includes no active management or manipulation of endemic species and their habitats.
4. The CCP should recognize as paramount the primary purposes for which the Refuge and its Wilderness was established, to conserve fish and wildlife populations and habitats in their natural diversity.

5. In recreation, the agency role should be limited to protecting the wilderness character of the Refuge, with minimum interference in the visitor's experience. This includes not accepting responsibility for the risks of visitors.
6. In Wilderness, the agency should adhere to the minimum requirement that is necessary to administer the area as Wilderness.
7. There should be no new developments of any kind allowed anywhere.
8. The necessity for commercial services should not be measured by market demand anywhere in the Refuge.
9. Where public use needs to be limited, private users should be given preference over commercial users.
10. Recreational and commercial ORV's, snowmobiles, and motorboats should be prohibited.
11. Competitive events should not be allowed.
12. Party size should be limited to eight.
13. Archeological investigations should be limited to non-invasive means.
14. No cabins should be built for either agency or public use. And there should be no commercial use of existing cabins.
15. Consistent with ANILCA, subsistence use should be continued for local residents, but motorized use by these residents should be within the bounds of reason, as established by rules set by the agency.
16. There should be advocacy for more designated Wilderness and Wild and Scenic Rivers in the Refuge.
17. There should be active consideration of designated Wilderness status for the entire Coastal Plain.
18. A complete prohibition on commercial hunting throughout the Refuge should be considered for the future.

The bottom line is the maintenance of the wilderness character of this jewel of the American National Wildlife Refuge system.

Thank you for the opportunity to provide these scoping comments.

Frank J. Keim
2220 Penrose Lane
Fairbanks, Alaska 99709

COMMUNICATION NUMBER 32651

Mark Lindsey

October 10, 2011

U.S. Fish and Wildlife Service Arctic NWR - Sharon Seim
101 12th Ave., Rm 236
Fairbanks AK 99701

Re: Comments on the Draft Comprehensive Conservation Plan and Draft Environmental Impact Statement, Arctic National Wildlife Refuge

Preface

My name is Mark Lindsey and my wife Susan and I have lived in Anchorage for 23 years. We are very fortunate that our three daughters now have families of their own here in Anchorage, and all are part of the Alaska community, working hard to make a future for their children. We have 4 grandchildren + one on the way, Alaskans all. We are stakeholders here.

I commend the Service for its diligent efforts in preparing the draft CCP to date. Reading through the 1,200 page draft has made me appreciate the complexity of the task being undertaken and how difficult it is to conduct a fully transparent process that adequately considers all points of view presented in public hearings and in written comments. Thank you for your ongoing efforts.

I have three specific comments and three general comments. They include the most complete references that I could locate. The comments are in some cases longer than I would like, but that is generally because I have included the relevant text of the authoritative guidance to show context.

Specific Comment #1

[32651.001, Preamble 002, 003, 006] Issue: In preparing the draft CCP for the Arctic National Wildlife Refuge (“ANWR”), is the USFW Service (the “Service”) correct in deciding to exclude meaningful consideration of the oil and gas development potential of the 1002 Area?

Discussion: The 1002 Area was created by the enactment of ANILCA in 1980. That legislation remains the most definitive record of what Congress intended for the 1002 Area. In ANILCA, Congress required the Secretary of the Interior to evaluate the 1002 Area for its potential as an oil and gas province. The result of this Congressional mandate was the April, 1987 issuance of the Arctic National Wildlife Refuge, Alaska Coastal Plain Resource Assessment, Report and Recommendation to Congress and Final Environmental Impact Statement. In that report, the Secretary of the Interior recommended opening the 1002 Area to oil and gas development, subject to certain stipulations. However, as we all know, to date no such legislation has been enacted.

These facts indicate that Congress and the Department of the Interior believe that the consideration of the oil and gas potential of the 1002 Area is central to any planning process for that section of ANWR. Of course, there is an abundance of other information indicating that the public feels the same way: that is, that regardless of whether one is for or against it, the issue of opening the 1002 Area is an issue of significance.

In the draft CCP, the Service justifies its decision to exclude consideration of the oil and gas development potential of the 1002 Area as follows (from the CCP draft summary updated August, 2011)¹:

“However, according to the National Environmental Policy Act (NEPA), the alternatives considered in an Environmental Impact Statement (EIS) must meet the purpose and need for the proposed action. The purpose and need for the CCP is to ensure that activities, actions and alternatives fulfill the legal purposes for which the Refuge was established.

The CCP also must fulfill the mission of the National Wildlife Refuge System and provide direction on how the U.S. Fish and Wildlife Service will meet these purposes. It is outside the Refuge’s and Service’s administrative authority to consider or propose oil and gas development alternatives. Congress has reserved the authority to make final decisions on oil and gas development in Arctic Refuge.”

There are a number of problems with this explanation. The first is the opening statement that the alternatives considered in an EIS must meet the purpose and need for the proposed action. NEPA says no such thing, nor is such a requirement included in the CEQ regulations at 40 CFR 1502. On the contrary, NEPA provides that an agency must²:

“(C) include in every recommendation or report on proposals for legislation and other major Federal actions significantly affecting the quality of the human environment, a detailed statement by the responsible official on

- (i) the environmental impact of the proposed action,
- (ii) any adverse environmental effects which cannot be avoided should the proposal be implemented,
- (iii) alternatives to the proposed action,
- (iv) the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and
- (v) any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.”

And 40 CFR 1502.14 reads as follows:

“Sec. 1502.14 Alternatives including the proposed action.

This section is the heart of the environmental impact statement. Based on the information and analysis presented in the sections on the Affected Environment (Sec. 1502.15) and the Environmental Consequences (Sec. 1502.16), it should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing

¹ The two pages in Chapter 4 of the draft CCP that deal with oil and gas provide only cursory background information, and do not constitute a thorough analysis of the potential benefits from and impact of oil and gas development on the Coastal Plain. By way of comparison, the 1987 Coastal Plain Resource Assessment presented to Congress ran 208 pages, of which about half was specifically devoted to oil and gas issues. With the addition of new data, analysis and technology since the date of that report, a similar assessment today would likely be longer. Note, for example, that the August, 2011 draft CCP is more than twice as long as equivalent content in the 1988 CCP, presumably due to more data/studies since 1988.

² Sections in bold type – emphasis added - are of particular relevance to the points being made.

a clear basis for choice among options by the decisionmaker and the public. In this section agencies shall:

- (a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.
- (b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.
- (c) Include reasonable alternatives not within the jurisdiction of the lead agency.
- (d) Include the alternative of no action.
- (e) Identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement unless another law prohibits the expression of such a preference.
- (f) Include appropriate mitigation measures not already included in the proposed action or alternatives.”

Nowhere in NEPA or in the enabling regulations is there any support for the Service’s explanation that an alternative must meet the Service’s purpose and need.

The notion that an alternative may be eliminated if it fails to meet the purpose and need of the action being proposed makes some sense in some cases. For example, when an EIS is required due to, say, a proposal to construct an ice road over tundra to reach a drilling location, it makes sense to limit alternatives to those which could achieve the same purpose – e.g. consider air transport to the site as an alternative, or consider other access to the site by means other than ice road, and to eliminate from consideration any alternative that has nothing to do with reaching the drill site. However, in the present case, the entire concept of eliminating an alternative if it does not meet the purpose and need as defined by the Service essentially results in a situation where the Service doesn’t have to consider any alternative use of the land that is not consistent with the mission of the Service. In other words, under the Service’s construction of this issue, it need not consider any views other than those that conform to its own policy objectives. This is clearly nonsense and is not what is intended in NEPA.

The narrow and very limiting definition used by the Service of the “purpose and need” notably excludes the primary reason that a CCP is needed in the first place: The need for a CCP is imposed by Section 304 of ANILCA, the same legislation that created the 1002 Area and set it aside for special studies of oil and gas potential. A more accurate definition of the need for the CCP would directly reference this ANILCA requirement. By setting it aside for oil and gas development study, ANILCA treats the 1002 Area differently from any other part of the National Refuge system and makes it very clear that there is a significant unresolved issue relating to land use there. Given this broader context of why a CCP is required, it is difficult to credit the Service’s decision to exclude full consideration of oil and gas development alternatives.

Further, [32651.002 NEPA Process -- Violations] the Service’s narrow and incomplete construction of “purpose and need” drastically limits the scope of the CCP and is in direct contravention of the requirement at 40 CFR 1502.14 that the EIS “should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public.” The draft CCP fails to sharply define the issues relevant to wilderness designation of the 1002 Area. As written, it obscures them.

Another problem with the Service's explanation is that it ignores another requirement of NEPA, taken from Title I of the law itself:

Sec. 102 [42 USC § 4332]: that the responsible agency must

"(E) study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources;"

If ever there was a proposal "which involves unresolved conflicts concerning alternative uses of available resources", a proposal to designate the 1002 Area as wilderness fits the bill. The Service's position appears to be that opening the 1002 Area to oil and gas activities is not an "appropriate alternative" since any "appropriate alternative" has to satisfy the "need and purpose" of the CCP. Whether this position is viable is probably a matter for the courts, but it is clear that it is a position that the Service does not need to take. There is a simple and logical solution that better serves the public interest (discussed below in General Comment #1).

Finally, [32651.003 Alternatives Analyzed -- No Oil and Gas Alternative] the Service's explanation that "It is outside the Refuge's and Service's administrative authority to consider or propose oil and gas development alternatives" is untrue and it in no way justifies exclusion of oil and gas development issues from consideration. Please note the following guidance from Council on Environmental Quality web site – list of 40 most faq's: also published at 46 Fed. Reg. 18026 (1981): Prepared by NICHOLAS C. YOST, CEQ General Counsel³.

"MEMORANDUM FOR FEDERAL NEPA LIAISONS, FEDERAL, STATE, AND LOCAL OFFICIALS AND OTHER PERSONS INVOLVED IN THE NEPA PROCESS"

"2a. Alternatives Outside the Capability of Applicant or Jurisdiction of Agency. If an EIS is prepared in connection with an application for a permit or other federal approval, must the EIS rigorously analyze and discuss alternatives that are outside the capability of the applicant or can it be limited to reasonable alternatives that can be carried out by the applicant?"

A. Section 1502.14 requires the EIS to examine all reasonable alternatives to the proposal. In determining the scope of alternatives to be considered, the emphasis is on what is "reasonable" rather than on whether the proponent or applicant likes or is itself capable of carrying out a particular alternative. Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.

2b. Must the EIS analyze alternatives outside the jurisdiction or capability of the agency or beyond what Congress has authorized?

A. An alternative that is outside the legal jurisdiction of the lead agency must still be analyzed in the EIS if it is reasonable. A potential conflict with local or federal law does not necessarily render an alternative unreasonable, although such conflicts must be considered. Section 1506.2(d). Alternatives that are outside the scope of what Congress has approved or funded must still be evaluated in the EIS if they are reasonable, because the EIS may serve as the basis for modifying the Congressional approval or funding in light of NEPA's goals and policies. Section 1500.1(a)."

This policy guidance from the agency in charge of NEPA is the exact opposite of the Service's approach.

³ Bold text is as published on the Internet – emphasis was not added here.

There is other language within NEPA and elsewhere in various Federal regulations and policies that could be cited here in support of the notion that Service has erred in its one-sided approach to the 1002 Area. This comment is already long, and I think the point is made, so I will leave those references for another day.

Specific Comment #2

[32651.004 ANILCA -- Designated Wilderness and ANILCA] Issue: Has the Service complied with all applicable laws and regulations and with USFW policy in its wilderness review of the 1002 Area?

Discussion: Per the draft CCP:

“The current review was initiated in compliance with the refuge planning process outlined in U.S. Fish and Wildlife Service (Service) Manual (602 FW 3 and 4) and is conducted in accordance with Service Manual (610 FW 3, 4, and 5).”

However, 610 FW (cited by the Service in the preceding paragraph) reads:

“4.12 What factors does the Service consider when conducting a wilderness study? We study each WSA identified in the inventory to analyze all values (e.g., ecological, recreational, cultural, economic, symbolic), resources (e.g., wildlife, water, vegetation, minerals, soils), public uses, and refuge management activities within the area. The analysis includes an evaluation of whether we can effectively manage the WSA to preserve its wilderness character. We analyze these elements through the refuge planning process to determine the most appropriate management direction for each WSA.”

The draft CCP does not comply with this provision in that it includes no meaningful analysis of the economic or mineral resources of the 1002 Area⁴.

This point also ties into the point made above – that NEPA similarly requires a close look at alternatives to the action being proposed (in this case, alternatives to the wilderness designation)⁵.

After studying this legislative, regulatory and policy guidance, it is clear that any consideration of the 1002 Area for wilderness designation must include a far more complete analysis of the oil and gas development potential of the region.

Specific Comment #3

[32651.005 ANILCA -- Planning Requirements] Issue: Is the 1002 Area a special case within the Refuge system and as such any blanket application of general management practices, refuge objectives and goals etc. may be inappropriate and inadequate under ANILCA?

Discussion: In ANILCA §1002, Congress set aside the Coastal Plain of ANWR and made it subject to special consideration. ANILCA includes several provisions concerning the 1002 Area that differ from the mandates for the Refuge system as a whole. By way of example, but not limitation, the standard applied to uses of Refuge lands generally is that such uses must be compatible with the major purposes for which such areas were established – a very restrictive provision. In ANILCA, Congress does not apply this restrictive standard to the 1002 Area. Instead, it established standards based on adverse effects. From ANILCA:

⁴ See footnote 2 on page 2 of this letter

⁵ Sec. 102 [42 USC § 4332]

“3) an evaluation of the adverse effects that the carrying out of further exploration for, and the development and production of, oil and gas within such areas will have on the resources referred to in paragraph (2)”

“...what additional legal authority is necessary to ensure that the adverse effects of such activities on fish and wildlife, their habitats, and other resources are avoided or minimized.”

Congress recognized the possibility that oil and gas activities could have adverse effects on fish and wildlife – but still wanted to consider opening the 1002 area to such activities. This is very different from, and much more lenient than the “compatible with major purposes” standard that applies elsewhere in ANWR. Further, the very act of carving out the Coastal Plain for study distinguishes it from the rest of the Refuge. However, in the CCP, the Service applies the same standards, goals, etc., those applicable to the Refuge system as a whole, to the 1002 Area. This “one size fits all” approach ignores Congressional intent, and is a deficiency in the draft CCP.

General Comment #1:

The economy of the United States is in serious trouble. Unemployment is at high levels. The increasing national debt threatens to crush future generations. We continue to import most of the oil we consume, at horrendous ongoing cost to the economy. Public respect for government institutions is low. The oil and gas resources of the 1002 Area have the potential to make a material positive impact in our national economy, provide thousands of jobs, help correct our foreign trade imbalance and improve the lives of Americans. Unfortunately, none of this will happen if the area is designated as wilderness after a one-sided analysis.

[32651.006 ANILCA -- Designated Wilderness and ANILCA] As steward of the Coastal Plain, you have an obligation to manage it as best you can, and of course this includes an obligation to assess and protect the wildlife resources and other aspects of this wild and complex place. However, you also have a responsibility to the American people to evaluate alternative uses of the land that may make sense, even if those uses are not consistent with what you as individuals or as an agency would like. While the objectives of the Wilderness Act are admirable, and setting aside lands as wilderness is an important part of preserving outstanding values for all Americans, the highest and best use of portions of the Coastal Plain may well be to develop the underlying oil and gas reserves. Clearly, man needs to exploit resources to live. By choosing to disregard this alternative land use, one that Congress and the nation as a whole are vitally interested in, the Service is failing to provide any decision maker – in this case, Congress, but also the American people – with a balanced and fair look at the possibilities that exist on the Coastal Plain. Instead, a one-sided CCP that results in a recommendation for wilderness designation for the Coastal Plain will make it even more difficult to ever conduct a balanced and fair dialog about this issue, an outcome that is a disservice to us all.

Please consider the future of our children and grandchildren. After all, aren't all these laws, regulations and policies ultimately supposed to see to their needs? Will there be opportunities for them if we don't create some? What public and private sector prospects will await them if we fail to adequately consider all our productive land use alternatives? Where will the funding come from to provide essential government services?

You are in a position of great power and responsibility as steward of ANWR. There are presently two pages⁶ that discuss oil and gas potential of the Coastal Plain: two pages out of 1,200. You cite

⁶ Section 4.2.7 of the draft CCP

21 reference studies of whitefish, 22 dealing with climate change, 30 about subsistence issues/data and hundreds of other references on a wide variety of subjects – about 600 references in all -but just one that addresses oil and gas development. This is hardly an evenhanded analysis of one of the most important issues in America today. Please put some balance back in the CCP by either (a) providing a full evaluation of an oil and gas development alternative for the Coastal Plain or (b) taking the approach taken in the 1988 CCP: Leave the 1002 Area as it is and continue to wait and see if Congress takes action.

The existing CCP published in 1988 deals with this issue much more reasonably and transparently. As stated in that CCP:

“The Fish and Wildlife Service (the Service) is presently managing the "1002" area as it has done in the past, essentially as a minimal management area. Until the Congress takes action on the future of the "1002" area the Service will continue this practice. In all alternatives included in this comprehensive conservation plan for the Arctic Refuge, the "1002" area is treated as a minimal management area. Actions that the Congress may take in the "1002" area—including making it available for oil and gas exploration and development or designating it as wilderness--will not be addressed in this plan. Any decision made by the Congress regarding the future management of the "1002" area will be incorporated into this plan and implemented. Should any additional studies or a wilderness review of the "1002" area be required, they will be undertaken and completed at that time (see also the "Wilderness Review of the 1002 Area" in the Introduction).”

This approach is entirely consistent with ANILCA. It also simplifies the CCP by obviating the need for either a wilderness study or an updated study of the oil and gas potential of Area 1002. It does not change the present management practices in Area 1002, which, in the absence of Congressional action, are expected to continue in any event. I have read the January 28, 2010 directive from the Director of the Service mandating wilderness reviews for Alaska Refuges. It would be a simple matter for the Director to amend this directive to exclude the 1002 Area based on ANILCA (which makes it clear that the 1002 Area is a special case within the Refuge system) and based on our national interest. Absent this action, if the wilderness review of the 1002 Area stays in, a comprehensive analysis of the oil and gas possibilities should also be included.

General Comment 2:

[32651.007 NEPA Process -- General] The one-sided approach presently taken in the draft CCP is an invitation to litigation, and while there is no certain course to preventing a lawsuit, it makes little sense to adopt a heading that invites one when better alternatives exist. There are several parties interested in the development of the 1002 Area with the resources and motivation to challenge the legality of the CCP on the basis of a number of issues, including some of the specific comments I have made here. The Service has the opportunity to change direction before finalizing the CCP by adopting the approach taken in the 1988 CCP. There are huge benefits to this approach, including benefits to the Service. Do you really want to spend untold work time defending your work in court, or do you want to publish a CCP that finds general acceptance among the various interested parties, while preserving the land and its resources? Wouldn't you prefer to devote your time to land management, and not to litigation? In addition to requiring enormous amounts of your time and attention, litigation will also further erode the effectiveness of government, reduce public confidence in your process and be expensive and time consuming. You have the opportunity to greatly reduce the likelihood of litigation with no adverse consequences to the land you manage. Please consider revising the draft CCP accordingly.

General Comment #3:

If you include a wilderness review of the 1002 Area in the CCP, please consider the following:

The Coastal Plain constitutes 1.5 million or 8% of ANWR's 19.3 million acres. Except for small areas around Kaktovik and Arctic Village, the rest of ANWR is either designated wilderness (8 million acres) or minimally managed as such (9.8 million acres). With the reduced footprint made possible by current oil field technology, the actual area required to develop the oil and gas resources is a small fraction of the Coastal Plain. If development occurs, more than 99% of ANWR would remain untouched.

The Federal government owns over 60% of Alaska, some 222 million acres. Of this total, the National Park Service and U.S. Fish and Wildlife Service manage about 120 million acres primarily for resource protection and fish and wildlife conservation. This highly protected area – about half of which is designated wilderness, and most of the rest has high wilderness characteristics and is minimally managed – is roughly the size of Colorado and Utah combined. If lands managed by the U.S. Forest Service are considered, the total of highly protected federal lands in Alaska is even higher. Full-blown wilderness designations in the United States (including Alaska's 58 million acres) total 110 million acres, an area larger than California. That's a lot of wilderness. Adding to it by designating the Coastal Plain as wilderness may be too much of a good thing.

An oil field that produces 500,000 barrels per day would, at \$100/bbl, generate gross value exceeding \$18 billion annually. That means thousands of jobs, huge tax revenues to fund improved government services, more oil in the Trans Alaska Pipeline and a vital boost to our national economy. Actual production from the 1002 Area (if it ever opens) may be more or less than this example, but 500,000 barrels per day is a reasonable number given mean oil reserve estimates for the area⁷. Even half that volume would provide enormous economic benefits. Prudhoe Bay peaked in 1989 at 1.5 million barrels daily.

I believe that Coastal Plain development can occur with minimum impact on important caribou and other resources. Damaging oil spills on the North Slope are rare events, and oil companies work relentlessly to prevent environmental impacts. If the Coastal Plain is developed, every action taken will be designed to minimize impacts and will be subject to protective permitting conditions and lots of government oversight.

Coastal Plain development won't solve all our problems, but it likely will make a decent dent in them. Designating the Coastal Plain as wilderness will prevent that from ever happening.

In light of these facts, I urge that you not recommend a wilderness designation for the 1002 Area.

Closing remarks:

In 1980 there was no consensus about whether the Coastal Plain should be protected or developed, so Congress asked (in ANILCA) for more information with an eye toward deciding the issue based on better information at a later date. As of the date of this comment letter, the situation is largely the same. The future of the 1002 Area is still in the hands of Congress, and by any reasonable measure, it doesn't have up-to-date empirical data on which to base any decision.

If the Service decides to subject the 1002 Area to a wilderness review, it has a legal obligation to fully evaluate the oil and gas development potential of the area. In the alternative, an approach

⁷ Analysis of Crude Oil Production in the Arctic National Wildlife Refuge, May 2008, Energy Information Administration [http://www.eia.gov/oiaf/servicerpt/anwr/pdf/sroiaf\(2008\)03.pdf](http://www.eia.gov/oiaf/servicerpt/anwr/pdf/sroiaf(2008)03.pdf)

that serves the public interest and complies with all legal requirements is to continue the policy taken in the 1988 CCP – leave the 1002 Area alone, manage it as it has been managed, and let Congress make the next move.

As presently drafted, the CCP does not comply with NEPA, or the Service's own policies regarding CCP preparation, and it ignores the fact that the 1002 Area is a special case under ANILCA, subject to standards and objectives that differ from those applied to ANWR as a whole. The draft CCP does not serve our national interests and will likely result in inefficient, time consuming, expensive and generally nonproductive litigation. I urge you to revise the draft CCP to correct these deficiencies.

Respectfully submitted,

[Signature]

Mark Lindsey
1016 W 22nd Ave #2
Anchorage, Alaska 99503

mklindsey@alaska.net

COMMUNICATION NUMBER 9556**John Lyle**

Fairbanks Hearing 10/19/2011

John Lyle

MR. LYLE: John Lyle, L-y-l-e. I need to first make a confession. My behavior is not 100 percent consistent with my advocacy. Here I am dressed in clothing made out of petroleum products. I arrived here on tires made from petroleum products. This morning I drank coffee flown to Fairbanks from halfway across the world, from petroleum products. Even a little free toy in the box of Toastie Flakes was made out of petroleum. But I am consistent in my belief that the Arctic Refuge should be permanently protected and, specifically, I support the Goals 1 and 2, addressing protection of ecological processes and wilderness character.

And **[9556.001 Refuge Values -- Special Values of Refuge]** I also support the special values of the refuge, and I think that should be a template to guide all management decisions.

[9556.002 Climate and Climate Change -- General Impacts] I also address addressing -- support addressing climate change, specifically by reducing stressors on wildlife and natural systems, including humans, meaning the visitor impacts should be monitored and strictly regulated so that the wilderness character is not only preserved but restored to its original condition. **[9556.003 Recreation and Visitor Use -- Air Transportation: Flying, Overflights, Landings]** I believe aircraft proliferation should not occur and landings should be limited to durable surfaces such as gravel bars. **[9556.004 Recreation and Visitor Use -- Special Use Permitting]** I believe there should be strict limits on numbers of outfitters and guides, and that vast sections of the refuge be totally off limits and set aside as commercial-free zones.

[9556.005 Wildlife -- Predator Control] I believe natural diversity should be encouraged without intensive management, like predator control or habitat manipulation particularly for the purpose of increasing game species for sport hunting.

By nature and from my own experiences, I'm very cynical about the ability to safely extract, process, and transport oil. I'm a strong believer in science, which overwhelmingly indicates humans have substantially altered the world's climate by burning fossil fuels. I refuse to forget the Exxon-Valdez and the BP gulf spill and I don't think the people living in the gulf or Prince William Sound will forget that either.

The NPR-A just west of the Arctic Refuge contains over 20 million acres of oilfields already leased to oil companies. If were serious about jobs and energy security as we say we are, let's develop these and other fields, and respect the wishes of both the Inupiaq and Gwich'in peoples who apparently are on differing sides over this issue. This issue is as symbolic as it's real. The reality is that it's an intact Arctic wilderness ecosystem, the only one in America and perhaps the only one in the world and it deserves to remain as it is.

Thank you.

COMMUNICATION NUMBER 136952

**Jeffrey Marion, Field Stn. Leader/Adj. Professor
Virginia Tech Field Station**

From: "Marion, Jeffrey"

Sent: Thursday, September 01, 2011 1:13 PM

To: "ArcticRefugeCCP@fws.gov"

Subject: Public comments on the Comprehensive Conservation Plan

Refuge planners/staff,

I am a USGS scientist who has collaborated with ANWR staff on visitor impact management, including the development of protocols for monitoring visitor impacts to trails and campsites. My research work and expertise lies in the area of recreation ecology, a field of study that evaluates visitor impacts to protected natural areas and advises managers on site and visitor management practices to avoid or minimize visitation-related resource and experiential impacts. I've reviewed the CCP and have the following comments for your consideration:

1. **[136952.001 Refuge Vision and Goals -- Goal 2 (including objectives)]** In the section 2.1.2 Goal 2 relating to wilderness management (Obj. 2.4) the plan emphasizes priorities relating to the clean-up of historic trash and sites. While this is a necessary activity I don't see proactive actions, such as the development and communication of Arctic-appropriate Leave No Trace educational practices, to the groups and organizations that left all that trash in the first place. I suggest an approach that cleans up from past mistakes and actively focuses on educating all current user groups (including internal and external research staff) to avoid and minimize future resource impacts. A good place to begin would be by having refuge staff trained at the LNT Master Educator level and development of the best-available educational practices for backpackers, river corridor visitors, researchers, and other groups. Outfitter/guide services should also be required as a condition of their permit to obtain adequate LNT training for their staff and to actively teach and adopt the best available LNT practices. **[136952.002 Refuge Vision and Goals -- Goal 2 (including objectives)]** Detail related to the appropriateness of permanent campsites and trails is missing from this section on wilderness – will the refuge be adopting a containment or a dispersal strategy for managing the impacts of visitation? Will there be trails and campsites or will you manage for pristine conditions? This is a fundamental question that should be addressed in the Wilderness management section of this plan.
2. **[136952.003 Refuge Vision and Goals -- Goal 3 (including objectives)]** In the section 2.1.3 Goal 3 pertaining to the refuge's Wild and Scenic Rivers the plan is also silent on defining management objectives related to the appropriateness of permanent campsites and trails and to management efforts designed to avoid/minimize future visitation impacts. This plan should establish clear and specific statements of the desired wilderness resource and social (experiential) conditions that managers seek to sustain for the refuge to guide development of the tiered management plans identified in this section. This should be followed by a description of the management strategies or actions designed to achieve and sustain those conditions, such as LNT educational efforts or visitor regulations. It fails to do so for both Wilderness and Wild and Scenic Rivers management.

3. **[136952.004 Refuge Vision and Goals -- Goal 5 (including objectives)]** In section 2.1.5 Goal 5 on recreation management the plan emphasizes “employing the least intrusive means of managing public use...” I suggest that this type of “hands-off” management approach has led to past visitor impact management problems and will only hasten the occurrence of future visitor impacts. This approach infers that it’s important for visitors to not encounter Leave No Trace educational messaging that could encourage the learning and application of low impact practices. If as stated in the plan, the staff seek to promote “visitor independence, self-reliance, and freedom” they should redirect the plan to prohibit aircraft landings within the Wilderness and Wild & Scenic River corridors rather than discourage effective visitor education efforts. Pack-rafting, as opposed to flown-in commercial rafters and hunters, epitomizes the qualities of visitation this Plan purports to encourage yet I was unable to find mention of this common and increasing type of use in Chapter 2 of the plan. Why does the plan make no effort to deter the growing, high-impact commercial river rafting and guiding services (including hunting/fishing) – which are in clear contradiction to their stated visitation objectives emphasizing “visitor independence, self-reliance, and freedom?” Further, I could find no mention of if aircraft will continue to be permitted to land on Wilderness and Wild & Scenic corridor lands (presumably they will). This practice is in considerably greater conflict with the stated Refuge goals than are the development of active low impact educational programs! I hesitate to use the word hypocrisy but it seems to fit here.
4. Our trail monitoring work has documented the development of many visitor-created trails, particularly in the Atigun Gorge area. The widespread internet-enabled sharing of GPS tracks and campsite locations by refuge visitors will likely ensure the creation of additional trails and campsites in the future (if unaware of this do some Google searches). Failure to educate visitors in appropriate dispersed “tundra-walking” and low impact “pristine site” camping practices ensures that the per capita impact of ANWR’s visitors will be much greater than is necessary and that informal (visitor-created) trails and campsites will continue to proliferate over time.
5. Once trails and campsites appear they attract even greater use and experience in other protected areas reveals that they are generally permanent (talk to managers at Denali and Gates). It is exceedingly difficult to reactively deter their use and restore them to pristine conditions. Experience reveals that a strong proactive management style is the best possible visitor impact management practice. In wilderness and pristine backcountry settings a strong educational approach to deterring these problems is the best available practice, yet this plan reads like such an orientation is to be prevented in order to “maximize the visitor’s freedom and independence.” Again, I suggest removing all outfitters and guides if that is an overriding management objective. I’ve seen no research suggesting that wilderness visitors detest being informed with low impact practices appropriate to the area they are visiting – in fact, results from numerous visitor studies reveal that visitors strongly prefer educational management responses to all other management options presented to them. I suggest a substantial revision of this section.
6. If management believes that a strong educational program is inappropriate then I strongly recommend moving from a dispersal to a containment strategy for avoiding/minimizing visitor impacts. For example, this would involve creating a sustainably designed formal trail, waterfall vista site, and campsites in the Atigun Gorge. Visitors would be naturally attracted to and would largely stay on these designated trails and sites and minimize associated off-trail impacts. I want to emphasize that a failed dispersal strategy

(guaranteed unless ANWR implements a strong low impact educational program), would result in far greater cumulative visitor impact. In other protected areas our research has found that numerous duplicative parallel informal trails will quickly form and that their aggregate impact exceeds that of a single formal trail (and the same w/campsites). This plan should make these choices and establish the management direction to guide all tiered subsequent plans. The current draft fails to accomplish this important function.

7. **[136952.005 Refuge Vision and Goals -- Goal 5 (including objectives)]** Section 2.1.5, Goal 5, Objective 5.8 – this section does specify “an environment essentially free from visitor impacts.” However, this section reiterates that “the least intensive and visible management activities” will be the focus. This seems to set refuge staff up for failure by removing active and effective visitor education from their toolbox. What specific actions will the refuge employ to achieve their management objectives relative to visitor use? Requiring all overnight visitors to obtain a permit and using that opportunity to actively impart low impact practices seems the only logical approach for a successful visitor impact management program. This is the most common and effective approach for most protected natural areas – I fail to understand why ANWR resists such an approach. For common day-use hiking areas the provision of trailhead information also seems important.
8. **[136952.006 Refuge Vision and Goals -- Goal 9 (including objectives)]** Section 2.1.9, Goal 9 on informing the public – this section introduces LNT educational practices, including safe bear viewing protocols. However, as noted previously, it again ties refuge manager’s hands by stating that “kiosks and signage will not occur on the Refuge, and on-site contacts will be minimized in recognition of the importance that the qualities of freedom and independence have to Refuge visitors.” I dispute that LNT educational efforts compromise visitor freedom and independence, as inferred by these statements. I’d like to see the peer-reviewed publications that support this erroneous position. I’ve not encountered anything resembling these statements in my work with dozens of other protected natural areas, including numerous wilderness areas and Denali NP. This planning language compromises resource protection efforts at the expense of presumably preserving higher quality visitor experiences - and I strongly question any inference that educational programs reduce recreation quality.
9. I’d be happy to discuss or consult further regarding any of these topics.

Jeff Marion

VT-VT

Jeff Marion, Ph.D. USDI, U.S. Geological
Survey Virginia Tech/CNRE, FREC
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[REDACTED]

COMMUNICATION NUMBER 32662**David McCargo**

DAVID McCARGO
 P.O. Box 100767
 Anchorage, AK 99510-0767

October 22, 2011

SUBJECT: Arctic NWR CCP

Mr. Richard Voss, Refuge Manager
 Arctic National Wildlife Refuge
 101 12th Ave., Rm 236
 Fairbanks, AK 99701-6237

Dear Mr. Voss,

As a frequent and regular visitor to the Arctic Refuge from 1971 to 1990, I am submitting the following comments and observations pertaining to Refuge CCP.

BUDGET CONSIDERATIONS

[32662.001 Refuge Infrastructure and Administration -- Staffing] With drastic budget cuts on the horizon, Refuge planners should presume that they will have significantly less resources. Many of the scenarios will not occur given their associated manpower and expense requirements. While the Service has many more mandated responsibilities since then, the Refuge was managed nicely once upon-a-time by a Refuge Manager, and Assistant Manager, and a Maintenance Man. Real wilderness does not need much if any management. It is a paradox that conservation agencies require increasing resources to manage less. The biggest problem for the Refuge will be that even if the status quo is maintained it will have a harder and more costly time of prohibiting incompatible uses. This argues for not allowing them in the first place, and preserving the wilderness character of the Refuge with minimal management. Having less money all around may be a good thing because it will limit the amount of mischief-making.

WILDERNESS

The Service should recommend the entire Refuge, with the possible exception of areas of major inholdings notably on the North Slope, for Wilderness because it both qualifies and deserves protection. Recommendation of other parts of the Refuge for Wilderness should not be tied to the future of the Coastal Plain nor should the Coastal Plain be held hostage while sacrificing other areas that may surpass its wilderness and biological importance such as the NPR-A that the Department abandoned during the Clinton years the quid pro being to leave the Coastal Plain alone. Designation of the Coastal Plain as Wilderness is a political decision that only Congress can make, and after decades of stalemate I doubt that it will occur in my lifetime if ever. The over-riding reason for the Service to recommend the Coastal Plain as Wilderness is that it would define the Administration's position on the Coastal Plain, but otherwise it would be essentially meaningless.

The Service should concentrate on what is achievable versus what is not.

Wilderness designation looks good on paper but in many ways is a chimera as evidenced by many of the pathetic and beat-up Wilderness Areas in the South Forty Eight states. What is most important is that the Service continues to commit itself to preserving the wilderness attributes of the Refuge i.e. through minimal management and prohibiting incompatible activities. Pre-occupation with the Coastal Plain should not be allowed to distract from other aspects of the Plan.

WILDERNESS MANAGEMENT

[32662.002 Recreation and Visitor Use -- Group Size] Controls need to be places on heavily used areas to prevent over-use and to preserve both recreational and non-recreational wilderness values. In my day, areas like the Kongakut, Sheenjek, Hulahula, the Chandalar went from seeing little or no use to a great deal of use resulting in significant observable impacts. The level of activity most certainly has gotten worse. Group size limits should be placed on noncommercial users as well commercial users, and consideration should be given to disallowing commercial groups in certain areas. Priority should be given to nonguided users where the recreational carrying capacity is exceeded to preserve the wilderness experience. I would not want to see a system develop in the Refuge akin to what has occurred In place like the Grand Canyon or the Tatshensheni where commercial groups have become grandfathered-in oligopolies.

[32662.003 Recreation and Visitor Use -- Air Transportation: Flying, Overflights, Landings] As part of the Refuge's wilderness management strategy, the Refuge has to address the pernicious problem of aircraft landings. How many, for example, are associated with different type of activities such as hunting, "subsistence", and floating and backpacking activities? Landing sites were proliferating all over the Refuge decades ago and once again must have proliferated since then. The Refuge to my knowledge has refused to do anything about it in a meaningful way. Landings should be prohibited on fragile habitats like tundra and be restricted to hardened and/or regenerative sites like gravel bars. It has been a longstanding recommendation on the part of many since ANILCA that there should be No-Fly Zones. Despite using them myself, aircraft are a real intrusion into Alaska wilderness and there are very few places left most notably northwest Alaska and Canada where aircraft are uncommon to almost absent. Not only are aircraft intrusive, but they degrade from one of the essences wilderness which is loneliness by being something of a security blanket.

WILDLIFE MANAGEMENT

The Service should resist any and every attempt by the State of Alaska to carry out predator control and any other deleterious wildlife management practices in the Refuge. State objectives are very different from the statutory responsibilities of the Service, and the Service quite frankly cannot be trusted to hold it's ground as evidenced by the recent attempt of the State to run roughshod over the Service on Unimak in the Alaska Maritime NWR. This gave the Service a black eye and hopefully will not be repeated elsewhere in the Alaska Refuge System.

The Service has abrogated its responsibilities on wildlife matters in other respects. My guess is that if one poured over the data one would discover that the Service borders on being clueless about the health of many wildlife populations in the Refuge and how they are being impacted by hunting and trapping. In my day, I was convinced that furbearers were pretty much

trapped out in places like the Porcupine, the lower Sheenjek, and around Arctic Village, and it is hard to imagine that the situation has improved since.

TRADITIONAL & SUBSISTENCE ACTIVITIES

It is not up to the Service to afford subsistence or anyone else any additional privileges not presently authorized by statute. **[32662.004 Subsistence -- Subsistence Management]** One has to call into question some of the baseline definitions, at least those that are not anchored in statute, surrounding what constitutes existing traditional activities on the Refuge including hunting, trapping, and other activities associated with subsistence. The biggest Kahuna is subsistence-related use of motorized equipment. While ANILCA authorizes traditional uses, it does not authorize unlimited use. That would be absurd.

Furthermore and contrary to popular belief, Alaska including the Refuge is wildlife poor. Even pre-contact Native populations in the Arctic were unable to live off the land in big numbers. Alaska's rural population is growing beyond Third World rates. When coupled with technology most notably mechanized access, so-called subsistence users have long ago exceed the carrying capacity of surrounding areas.

Subsistence use in much of Alaska is a myth. Conservation system managers including the Service are too scared to acknowledge this the consequence of which is the myth keeps being perpetuated, including by environmentalists, and that the conservation units keep being degraded.

[32662.005 Cabins/Camps --] Additional permanent and semi-permanent subsistence facilities, or any structures for that matter, should be disallowed because their proliferation could be endless. Structures of any sort other than those of historical significance are incompatible with Wilderness and by extension should be prohibited in potential Wilderness Areas.

OTHER

[32662.006 Refuge Infrastructure and Administration -- Administrative Sites] The Peters Lake facility has always been an intrusion and should be downsized at the very least and preferably removed for the reasons stated.

[32662.007 Refuge Management Policies/Guidelines -- Subsistence Management] Use of the Refuge for the gathering of house logs is not a compatible Refuge use. First, who is going to supervise it? Second, once permitted it would be an ongoing and a open-ended activity. Third, it would require increased motorized activity in the Refuge.

[32662.008 Refuge Vision and Goals -- Goal 4 (including objectives)] The Refuge should be encouraged to gather oral histories from the Native "Elders" as suggested. Such histories would be important to document insofar as possible what really constituted traditional use by local peoples and perhaps more importantly capture insights into what is a quickly vanishing way of life. This might also be a good way to interest and involve younger Natives in the Refuge.

[32662.009 Land Status -- Native Ownership] Fortunately, the Arctic Refuge is fairly clean of Native Allotments that plague most of the other Alaska conservation units. Most of the Allotments applications were fraudulent or dubious at best. The Service needs to examine what it can and cannot to regulate Allotments such as the manner of ingress and egress. Like other intrusions, Allotment impacts will continue to get worse over time.

The Last Great Wilderness Alternative as presented in the last CCP process still represents for me the best approach for protecting the Refuge as envisioned by those who were responsible for creating it. None of the Alternatives presented in this latest exercise satisfactorily incorporates my concerns not to mention that one could argue that these types of planning process are exercises in futility. The proof in the pudding is that the National Wildlife Refuge System, including the Arctic Refuge, and other conservation systems are in worse shape than ever. Most of the issues that I and others have talked about for years are worse than ever such as overuse, habitat degradation, excessive hunting and trapping, aircraft use, and deterioration of wilderness qualities in general. No amount of planning is going to change the inexorable direction in which we were headed unless those in charge acknowledge the obvious limits that are staring us in the face.

Cordially yours,

David McCargo
DMcC/dmcc

COMMUNICATION NUMBER 136800**Debbie Miller, Author****Caribou Enterprises**

Attachment:

November 15, 2011

To: USFWS

Fr: Debbie S. Miller, Author

Caribou Enterprises

1446 Hans Way

Fairbanks, AK 99709

[REDACTED]
907-470-8345

Re: Comments for Arctic Refuge Draft CCP

Dear Arctic Refuge planning team,

Thank you for the work you have put into this massive draft comprehensive management plan. Having explored the Arctic Refuge for many years, beginning in 1975, I appreciate the opportunity to comment on the plan's proposed vision, goals, special values, objectives, management guidelines, and alternatives.

Vision Statement:

[136800.001 Refuge Vision and Goals -- Vision] I'd like to suggest that you consider revising the vision statement to read:

"This untamed arctic landscape continues to sustain the ecological diversity and special values that inspired the Refuge's establishment. Natural processes continue, traditional cultures thrive with the seasons, and we honor the land and its diversity of wildlife through responsible stewardship. By exercising restraint, this unique wilderness is passed on, undiminished, to future generations."

Goals:

[Preamble 136800.002, 003, 004] I recommend that you revise a few of the goals to better reflect the purposes for which the Arctic Refuge was established:

[136800.002 Refuge Vision and Goals -- Goal 1 (including objectives)] Goal 1: Modify: Ecological processes shape the Refuge, and its management respects this natural order without altering the diversity of fish and wildlife populations and their habitats.

Goal 2: This is an excellent goal which should guide all aspects of management.

[136800.003 Refuge Vision and Goals -- Goal 5 (including objectives)] Goal 5: Modify: The Refuge provides the opportunity for recreational activities such as hiking, floating, hunting, fishing, wildlife viewing, and camping, in a manner that protects the special values of the Refuge. (This better relates to visitor use planning objectives)

[136800.004 Refuge Vision and Goals -- General] Consider adding one additional goal:

Goal 10: The Refuge wilderness character is restored when it is apparent that present or past use has degraded Refuge lands or waters. (this relates to Objective 2.4 Comprehensive Wilderness Management).

Special Values:

I think the 11 special values articulate the significance and international importance of our largest and wildest refuge. These special values should guide all management decisions.

[136800.005 Refuge Values -- Special Values of Refuge] 1.5.1, Wilderness Characteristics: I suggest that you note that the Arctic Refuge stands alone as the only wildlife refuge in America whose fundamental purposes for establishment includes its wilderness value, in addition to wildlife and recreational values. This original wilderness purpose makes the Arctic Refuge unique among the more than 500 refuges in the National Wildlife Refuge System.

Objectives:

[136800.006 Refuge Vision and Goals -- Goal 1 (including objectives)] Objective 1.11: Status of Rare Species: This objective states that efforts to identify and determine the status of rare species “will be initiated within five years.” It would seem that any threatened, endangered, or declining population of a certain species, should be given a higher level priority for study efforts, certainly sooner than “within five years.”

Shouldn't endangered species and at-risk populations be part of management's current and ongoing priorities?

[136800.007 Refuge Vision and Goals -- Goal 1 (including objectives)] Objective 1.7: Wildlife-Management Proposals: This objective recognizes the need to coordinate with the Alaska Department of Fish and Game, as the Board of Game is responsible for conservation and management of Alaska's wildlife resources. This objective could be strengthened by noting that predator control and intensive management practices of the State of Alaska could potentially be in conflict with the Refuge's purpose of maintaining wildlife populations in their natural diversity. If predator control programs are proposed within the boundaries of the Arctic Refuge, Refuge purposes should prevail, and such programs should not be allowed.

[136800.008 Refuge Vision and Goals -- Goal 5 (including objectives)] Objective 5.2: I highly support this objective which avoids the placement of public use interpretive signs, structures, and installations. Keeping it wild and perpetuating opportunities for adventure, exploration and discovery --- without signs, kiosks, trails, and structures--- is certainly the intent of the founders and advocates for the original Arctic Range. This objective is also in keeping with Goal #2.

[136800.009 Refuge Vision and Goals -- Goal 5 (including objectives)] Objective 5.8: Visitor Use Management.

Some river corridors, such as the Kongakut, receive an abundance of visitors between commercial and private float trips. I wholly support visitor use controls to minimize impacts. All of us have to remember that our number one priority is to maintain and protect the wilderness character of the Arctic Refuge. If too many parties are on the river at the same time, and damage is occurring, be it habitat degradation, trash or sanitation issues, management needs to limit the number of both commercial and private parties through permits.

Management should establish group size limits for both commercial and private, and monitor the number of parties on those rivers that are intensively visited. I personally think that 8 people should be the limit for any party, be it commercial or private, for any wilderness trip.

With our technology age, it should be relatively easy and cost effective to implement a registration or permit system so that management would have a better idea of visitor use and possible impacts each year. If several parties register for trips on the same river, at the same time, it's up to management to control overuse. Managers can't maintain or protect the wilderness character of a river corridor unless they know who is visiting the area, number in party, and timing of the visit. Groups with over four people, commercial or private, should register their planned trip with dates.

Management might not want to control all visitor use, but again, it's the extraordinary wilderness character of the refuge that must be protected. This fundamental value should guide and govern management philosophy.

Alternatives:

[136800.010 Alternatives Analyzed -- Alternative E: Wilderness] I support Alternative C and Alternative E with respect to the establishment of new wilderness areas within the Arctic Refuge.

However, Alternative E needs to modify its proposed wilderness boundaries to better reflect the local concerns of Venetie and Arctic Refuge residents. There should be an adequate amount of land surrounding these villages for logging, subsistence activities, and other possible commercial uses. I recommend that USFWS conduct a series of meetings with villagers to better define these boundaries for proposed wilderness on the south side of the Brooks Range.

Securing wilderness designation of the coastal plain of the Arctic Refuge has been a goal for many Americans for more than three decades. This is the most threatened area within the Refuge and the most biologically sensitive region. Alternative C should take precedence because of this.

At the same time, USFWS should work with local communities in the southern region of the Refuge and propose a southern wilderness region that has widespread support. When Alternative E is modified to reflect those interests, we can move forward with future wilderness proposals for the southern region of the Refuge.

I'm very pleased that USFWS has formally recognized the new wilderness study areas that are depicted in Alternative E.

Budget:

[136800.011 Alternatives Analyzed -- Alternative E: Funding and Personnel] Given our economic times, I was somewhat surprised to read that 21 employees would be needed if Alternative C or E were to be implemented. Our current budget hawks might find it rather absurd to learn that 21 new staff positions (\$749,000) are needed to designate some of the Refuge lands as wilderness? Some thought should be given to our economic times and the true budgetary needs for wilderness managed lands.

Frankly, I can't imagine that new wilderness legislation would pass Congress with such a fiscal note attached. I recommend that the budget for managing wilderness be more modest and in keeping with current staffing at the Arctic Refuge.

Thank you for giving me the opportunity to comment on this draft plan.

Sincerely,

Debbie S. Miller

COMMUNICATION NUMBER 136985

Susan Morgan

From: Susan Morgan

Sent: Friday, November 11, 2011 7:27 PM

To: ArcticRefugeCCP@fws.gov

Subject: Arctic Refuge Comprehensive Conservation Plan (CCP)

Dear Fish and Wildlife Service Personnel,

For the past forty-five years, I've supported protection for Alaska Wilderness and National Parks and have been particularly interested in making sure there is a wild and free Alaska National Wildlife Refuge. Early on, I was fortunate to work with such luminaries as Mardy Murie, Celia Hunter, Bob Marshall's two brothers, Jim and George, Ted Swem, and others. Their inspired vision taught me, and many others, the immeasurable value of "the last great wilderness in the United States...a treasure not just for the United States but for the world." (Schaller, 1956)

I have read the draft EIS for revising the Arctic Refuge Comprehensive Conservation Plan and am writing to support Alternative E, which recommends wilderness designation for the entire Refuge except for lands near villages in the area. My comments here will be brief and general in nature.

[136985.001 Refuge Values -- Special Values of Refuge] Description of purposes and Special Values of the Arctic Refuge: These are excellent and should guide all management decisions both in designated and potential Wilderness in the Refuge.

The goal that calls for protection of ecological processes and wilderness character is also excellent.

Wildlife: **[136985.002 Wildlife -- Predator Control]** Guidelines that provide for protection of population dynamics of species without predator control should be strengthened by implementing the Agency's non-intervention policy, which is well stated in the very important climate change management guideline. **[136985.003 Wildlife -- Predator Control]** A conflict exists between State management and Refuge management of wildlife, and while the draft plan acknowledges the need for coordination, it should direct the FWS to place wilderness values and Refuge responsibility for maintaining natural and wild wildlife populations above State objectives. The final plan must assure that the primary Refuge purpose to conserve natural diversity must never be compromised or preempted by decisions to allow predator control or habitat manipulation to increase game species for hunting. **[136985.004 Alternatives - Issues Considered but Eliminated -- Ecological Issues]** The Refuge is mandated to preserve biodiversity, so restriction of trophy hunting of Dall sheep and other species should be included in this draft and not deferred for further study.

Visitor Use: **[136985.005 Recreation and Visitor Use -- Visitor Use]** This draft CCP falls quite short in addressing growing visitor use impact. Wilderness character must be restored along river corridors that have been degraded, such as the Kongakuk. A process to restrict aircraft landing sites and to restore existing impacted areas must be established, and specific areas should be designated where aircraft is not allowed. It is also imperative that the FWS establish zones where commercial services are not allowed; the Agency should limit the number of outfitters permitted in the Refuge. While prohibiting helicopter landing for recreation use is desirable, additional FWS helicopter use in the Refuge should also be limited.

Buildings: No new Administration Sites or Visitor Facilities should be constructed in the Refuge, and the unsightly administrative buildings on Peters and Big Ram Lakes should be removed.

[136985.006 Alternatives - Issues Considered but Eliminated -- Management Issues] Conflict between wilderness values and science-related technologies: This escalating conflict is not adequately resolved by the current MRA process and should be addressed in the CCP.

[136985.007 Glossary (Appendix M) --] Polly Dyer, now 91, an Alaska traveler and still an active wilderness advocate in Washington State, suggested “untrammelled” to Howard Zahniser when he was looking for just the right word to include in the Wilderness Act. They believed the meaning of “not restricted or hampered or deprived of freedom of expression” of natural processes most clearly defined the meaning they wished to convey.

Although in Alaska native people are allowed to “remain” to accommodate important subsistence lifestyles, revising the definition of wilderness should not be done in this CCP for management purposes. “Permanently” should be deleted in the glossary definition because it is neither in the spirit nor the letter of the Act as penned nor as passed by Congress in 1964.

I appreciate this opportunity to comment on the Arctic Refuge Comprehensive Conservation Plan and hope my comments will help the FWS strengthen its role in the protection of the Arctic National Wildlife Refuge.

Sincerely,

Susan Morgan, PhD
2612 Sylvan St.
Bellingham, WA 98226



COMMUNICATION NUMBER 136804

Matt Nolan

From: "Matt Nolan"

To:

Subject: my CCP comments

Hello. Attached please find my comments on the CCP draft as well as a research paper that I reference in those comments. Please let me know that you have received these, and feel free to contact me for more info or clarifications. Thanks again for all of the hard work that went into this draft, and in advance for all the hard that I'm sure yet remains to produce the final version.

Thanks,
Matt

- CCP_nolan.pdf - ICRW4_Nolan.pdf

Attachment:

To: Arctic Refuge Management

From: Matt Nolan

Date: 11 Nov 2011

Re: My comments on Draft CCP

I have read the draft CCP cover-to-cover and want to thank the Arctic Refuge staff for such an outstanding job of pulling together so much useful and interesting information about the Refuge. I would recommend someone there to condense this a bit and turn it into a coffee table book filled with photos.

I have several comments on the draft CCP which I would like to share, most related to issues and plans that the draft plan solicited input on but some that I did not see identified directly.

[136804.001 Recreation and Visitor Use -- Visitor Experience]

Kongakut River management. This issue is indeed a tricky one -- how to keep the public from loving the place to death as well as how to manage the public without them feeling like they are entering through the Iron Curtain. I think the Management Alternatives regarding education are all great ideas. However, I would propose an even simpler alternative that could be implemented at almost no cost right away. I'm a big fan of letting folks self-organize to meet common objectives, but often this requires some top-down help. In this case, I think establishing a web page, something akin to a Google Calendar, that would allow commercial operators or individuals to post their proposed dates and locations to a centralized location would eliminate much of the overcrowding issue without management intervention. That is, those users who seek a wilderness experience with minimal human interaction would spontaneously utilize such a calendar to avoid such interaction. The calendar itself would not be binding or enforced in any way, it's just a way of letting others know each others' intentions. If this is outside the current purview of Refuge management, I suspect an unofficial suggestion of this idea to the major guiding outfits would go a long way.

Management Alternatives. I am in favor Alternatives B-F, but would most favor Alternative E. Alternatives B-F all seek much needed additional staffing and resources for the Refuge and this funding should be granted. I would like to see the three WSAs be put forward for protection under the Wilderness Act. I would also like to see the Atigun, Hulahula, Kongakut, and Marsh Fork Rivers protected further under Wild and Scenic River status. However, [136804.002

Studies/Research --] I think it is important to grant scientific study increased status and protection within these Wilderness areas and that Refuge staff should advocate that such protection be specifically written into legislation that Congress might pass. For example, it should be specifically allowed that some density of weather stations, stream gaging stations, snow courses, glacier mass balance sites, and other small scientific installations that contribute to our knowledge of ecosystem, landscape, and climate change in these regions be permitted to exist in these new designated Wilderness regions as part of the legislation, as well as efficient access to them, so that a coherent plan can be designed and managed from the outset. These could be thought of as 'scientific inholdings', with a selection and conveyance process similar to native inholdings. [136804.003 **Natural Areas -- Research Natural Areas]** I would also ask

considerations of some complete watersheds be considered Research Natural Areas, that have authority to encourage activities necessary for research but discourage those that do not.

[136804.004 **Natural Areas -- Research Natural Areas]** Should these areas be considered by Congress for Wilderness designation, I would ask that Refuge staff advocate for two other uncommon requests. I would ask that the McCall Glacier Valley be re-considered by Congress as some sort of official scientific inholding within the existing Wilderness, helping to ensure that this valuable long-term research site is protected against the vagaries of politics and individual personality conflicts. This could be as a new RNA (land swap with an existing RNA?) or a donut hole of minimal management. [136804.005 **Transportation and Access -- Mode of**

Transportation] I would also ask that helicopters be considered as legalized alternatives to fixed wing aircraft (that is, not replacing fixed-wing, just granting similar access) in these new wilderness areas. I'm no huge fan of helicopters, and I currently work hard to meet the current Refuge philosophy on their use, but practically speaking they have a lower environmental impact and it would greatly reduce wear and tear on the limited number of fixed-wing strips (extending their life) if commercial helicopter use were permitted. So it's not so much that I want to use them, I mainly want to ensure continued fixed-wing access by minimizing pressure on existing strips and associated camping areas. At the moment, there is no protection against helicopter flightseeing, so this is moot as it would remain the same. It would be fine with me to limit passenger offloading to some specific sites (like coordinates with a radius) or to, for example, some unvegetated valley bottoms etc. and prohibit from some others. Other than the specific legal prohibitions or sanctions (eg. ANILCA, the Wilderness Act), the philosophical debate about whether helicopters are more 'wildernessy' than fixed wings is subjective in my opinion, and I think once most people realize that helicopter access is the same price as fixed wing (consider that a new R-44 is cheaper than a used Beaver, and R-44 rates are lower or on par with fixed wing rates going into the Refuge) I think public opinion would shift on this. I certainly don't want to see Princess Tours arrange dozens of landings per day, and I think this could easily be avoided by the commercial group size limitation or, for example, authorizing that helicopter landings are only allowed for passengers intending overnight stays, etc. In any case, should nearly the entire Refuge become Wilderness, I think there would be ways to manage helicopter access to an acceptable level without eliminating it completely, to keep it on par with current fixed-wing traffic but with much less environmental damage, but most importantly that these issues (and similar ones) should be addressed and written into the legislation to address and protect the unique and special needs of arctic Alaska and Alaskans.

Management Goals. I think the 9 management goals and objectives are all clear and reasonable, and I support all of them. I am in particular favor of goals 6 and 7, as well as management guideline 6, all which deal with ensuring scientific study of the Refuge in the context of climate change and the Refuge's role as an internationally-recognized benchmark for naturally functioning arctic ecosystems. **[136804.006 Natural Areas -- Research Natural Areas]** I would like to see more specific recognition of the McCall Glacier research program in these goals and within the CCP. This project is, perhaps arguably, the most internationally-recognized research program within the Arctic Refuge, and certainly the most intensively studied valley within the Refuge over the past 50 years. Explicit description of the value and findings of this project within the CCP would likely help ensure its continuation and help scientists and managers alike in protecting it. There is no other project like this in Arctic Alaska, let alone the Refuge, and I believe this is worthy of highlight within the CCP.

[136804.007 Glaciers --] The Role of Refuge Glaciers within the Refuge. I felt that the role of glaciers within the Refuge ecosystems was not treated adequately within the CCP, and I advocate for this role to receive status and highlight equal to or exceed that received by permafrost within its text. Specifically, I have attached a peer-reviewed paper that outlines the central role that glaciers may play in ecosystem function in the 1002 area, and I believe that this text should be included in some form within the CCP. Specifically, the only section of glaciers within the CCP, section 4.2.1.8, is awkwardly placed. The interactions of the physical landscape with the living zone, that is how one affects the other, is a primary goal of ecological study and one which the founders of Arctic Refuge were keenly aware of and seeking to ensure would occur here in perpetuity. I believe the interactions of glaciers here with fish, birds, shrubs, and marine food webs is a great example of this sort of study and could be blended in easily with the existing text for everyone's mutual benefit.

[136804.008 Recreation and Visitor Use -- Visitor Use] User permits. It may be that if additional Refuge funding materializes as proposed, that a user-permit system be implemented. I'm not in favor of anything onerous or anything leads to an approval/denial process for currently supported activities, just something to help with usage statistics for better management practices and ensuring adequate continued management funding. What I have in mind is a simple web-based tool, in which a visitor is funneled through a series of educational web pages that overview the essentials of what every visitor should know (history/philosophy, best camping practices, animal disturbance, legalities, non-permitted activities, etc), at the end of which a permit number is automatically granted; by uniquely tying a permit number to an individual, the individual is accepting responsibility for knowledge and respect of Refuge rules and legalities, and could skip the web pages if he or she wishes. At this time, the user has the choice of indicating their trip dates and locations and intents, but this information is not mandatory. Those users seeking solitude, however, would likely be self-motivated to give this information so to avoid user-interactions. Such a system would track both commercial and non-commercial users in the same way, and take pressure off of guides and air taxis to provide Refuge staff with usage data, they would only be required to list permit numbers for their clients, leaving the data itself up to the client in the application process. And while I'm all in favor of keeping Refuge access as unrestricted and permit-less as possible for everyone, the line between what is commercial and what is noncommercial seems like a very fuzzy one and I don't understand the need for awkward philosophical distinctions when the primary goals of Refuge physical protection are much more clearly defined, observable, and enforceable. But there may be larger issues that I'm unaware that necessitate this need, and here I'm mostly just thinking of small-scale commercial operations like photographers, film makers, scientists, etc. So I advocate for commercial work to be permitted

within the Wilderness in the same way as noncommercial work, provided that work does not exceed any privileges open to the public. For example, my opinion is that if a commercial photographer comes to the Wilderness via fixed wing or on foot, he or she should not be required to do anything more than a private individual who takes a tourist photo, if their outward appearances and impacts are the same. Further, the tourist should not at risk for Federal penalty if later they sell one of their photos having not submitted a commercial permit before their trip. If a commercial user seeks to use a helicopter, run a generator, etc, then this of course should go through the MRA process, but the same would apply to a non-commercial party, and this is something that could be flagged in an on-line education/permitting tool and the user directed to appropriate new web pages to start that approval process. So it seems to me that the criteria for allowing/denying an activity should be related to observables like access means, disturbance, group size, etc that are applied to all users, rather than primary intent, which is nearly impossible to define or enforce, as a user may come for one purpose, but leave fulfilling another, and the primary uses identified and supported by Arctic Refuge are so broad that any visitor cannot help but to leave fulfilling at least one of those uses. On the flip side of being fair, it seems to me that any restrictions currently placed on commercial groups should likely be placed on private groups, if these limitations are in the long-term interest of preserving the Refuge. In any case, the education program the Refuge management advocates is perhaps the most important and useful tool for protecting the land, regardless of permitting issues, these are just some thoughts on combining the two.

[136804.009 Transportation and Access -- Baseline Conditions] Fixed-wing access points. I advocate for Refuge management to select several popular fixed-wing access points to be maintained throughout the Wilderness and non-Wilderness regions. Though I don't want to see road signs and interpretative displays, I do want to have access to the Refuge via air travel and it is simply impossible to prevent some decay of fixed-wing landing zones on vegetated surfaces and, at least on the North side, there are simply a limited number of suitable locations. Where gravel bars are available, yes clearly they should be used. But where they are not, then I think it is in everyone's best interest to harden or improve the locations that are going to be used anyway, rather than allow them to be chewed up to the point where they are no longer safe or usable. At some locations, like mid-Jago and 5 mile on the Hulahula, the river is eating into the landing zone. I do not advocate for bulkworks or riprap here. But, clearing shrub growth, filling ruts with rocks, marking runways with natural objects, and similar low-tech activities should be allowed without fear of prosecution, similar to what was done at Grassers, such that there are at least a few useable strips on each major watershed. Regarding gravel bars, the issue, at least on the North side, is that most 'bars' are covered with cobbles until you get close to the coast, such that even these locations would require regular work to keep clear. An alternative of limiting fixed-wing access to float planes I believe would be misguided, as there is likely the same amount of environmental damage, it's just harder to see visually (hydrocarbons in the lakes, disturbance of subaqueous shore stability, etc).

[136804.010 Recreation and Visitor Use -- Air Transportation: Flying, Overflights, Landings] Mechanized free zones. I read about such comments and though I'm not much in favor of designating an area totally free of aircraft landings, I would not be opposed to, say, prohibiting or discouraging their use on weekends or something similar in an area.

Additional Attachment Included in PDF File:

- Predicting the Impact of Glacier Loss on Fish, Birds, Floodplains, and Estuaries in the Arctic National Wildlife Refuge

COMMUNICATION NUMBER 136993

Julie Raymond Yakoubian

From: Julie Raymond-Yakoubian

Sent: Sunday, November 13, 2011 9:17 PM

To: arcticrefugeccp@fws.gov

Subject: Arctic Refuge Comprehensive Conservation Plan comments

To: Arctic National Wildlife Refuge

I am writing regarding the Arctic Refuge Comprehensive Conservation Plan. As someone who has long been concerned about the fate of the Refuge, and the coastal plain in particular, I hope you will fully consider these comments. As graduate students my husband and I saved up money for many months in order to be able to visit the Refuge and to hike through the coastal plain and a portion of the 1002 area. That two week trip was one that we will never forget and which was personally significant for me in many ways. I strongly believe that the wilderness and solitude which I experienced on that trip should be preserved and protected for posterity. I am not so naive to believe, however, that a place like the Refuge is only important to me, or others who have been privileged to visit it in person. In fact, while I was a graduate student in Anthropology I decided to pursue a second master's degree in order to further explore why this one place - out of all possible places - was so important to so many people - in particular, why it was so important to people who had never even visited it (and many of whom had no intention of ever visiting it).

[136993.001 Recreation and Visitor Use -- Visitor Experience] It turns out that there are a variety of compelling and important reasons why individuals who have never been to the Refuge value the place and I refer you to my UAF Northern Studies MA Thesis to read more about those reasons ("Distance Activism and the Arctic National Wildlife Refuge") - reasons that I know are still valid today. For me personally, the Refuge, especially as a wild place, is important for its totally unique wilderness, wildlife, and subsistence values, as well as for its cultural resources and the symbolic values it represents.

I have several recommendations in response to the draft CCP. First, I would like to thank you for doing a Wilderness Review and urge you to complete this review as part of the final CCP. I urge you to support Alternative E - which would recommend wilderness designation for the entire Refuge, except for areas surrounding villages. I appreciate the strong Vision Statement and Goals in the CCP. Additionally, it is my strongest desire that you use the "Special Values" section to guide Refuge management from here on out. I support the proposed goals - particularly goals 1 and 2 which would protect ecological processes and wilderness character, as well as goal 5 which would preserve visitor experiences with minimal management actions.

There are several areas which I believe need additional attention and clarification for the final CCP. The first is visitor impacts.**[136993.002 Recreation and Visitor Use -- Impacts of recreation on other resources]** I believe the CCP needs to address some of the significant visitor use impacts that have occurred since wilderness designation in 1980 - and impacts that may occur in the future - and that the final plan must adequately address this issue. Also, **[136993.003 Recreation and Visitor Use -- Air Transportation: Flying, Overflights, Landings]** the issue of aircraft landing sites needs to be addressed through regulations that both prescribe measures to restore already impacted areas and that prevent aircraft landings in sensitive areas, limiting them to durable surfaces such as gravel bars. Related to this - **[136993.004 Recreation and Visitor Use -- Commercial Operations, General]** the CCP should limit the number of commercial outfitters

allowed into the Refuge and establish commercial free zones. While I support the prohibition on helicopter landings for recreation, I believe that use of helicopters should be entirely prohibited.

[136993.005 Consultation and Coordination -- State Coordination] Another area of concern for me, which needs additional clarification before the CCP is finalized, is the role of the Alaska Department of Fish and Game. As you well know, the state's wildlife management goals are often in conflict with maintaining natural and wild animal populations. The final CCP needs to explicitly outline that wilderness values and Refuge purposes will prevail in cases where they conflict with state or Board of Game recommendations. Predator control and habitat manipulation to increase wildlife populations for hunting must be explicitly not allowed - the Refuge purposes of conservation of natural diversity must always prevail. (Related to this - comments in Appendix B 1.1 regarding FWS and ADFG "mutual concern..." should be deleted since this statement is untrue.) I support Management Guidelines 2.4.11, 2.4.12 and 2.4.12.7 which allow for the natural behavior and interactions and dynamics of all species to continue and which leave habitats unmanipulated by management.

Some additional comments:

-[136993.006 Alternatives - Issues Considered but Eliminated -- Management Issues] In Appendix D 4.1 conflict between wilderness values and science-related technologies should be further addressed in the final CCP. The current MRA process does not adequately resolve this growing issue. **-[136993.007 Refuge Infrastructure and Administration -- Administrative Sites]** The buildings on Peters and Big Ram Lakes should be removed. This issue needs to be addressed in the alternatives. Related to this - **[136993.008 Refuge Infrastructure and Administration -- Administrative Sites]** the management guideline for Administration Sites and Visitor Facilities should prohibit construction of any new buildings in the Refuge.

Thank you for your consideration of my comments.

Julie Raymond-Yakoubian

PO Box 1628

Nome, AK 99762

COMMUNICATION NUMBER 136912

Edward Sam

Arctic Village Hearing 10/03/2011 and 10/04/2011

[Preamble 136912.002] Edward Sam

Edward Sam: Wants to leave the area (refuge) alone. If you do anything, make this place as it is a wilderness. Does not want development to occur that would impact the area or resources. He is concerned about the health of the caribou. Says the caribou have been impacted by pollutants and contaminates making the caribou unhealthy to eat. He does not want to tell his people of the danger to the caribou and themselves, says the managers should be the ones to give them the bad news.

Says the US government is still trying to do the us (Alaska Natives) what they did down in the State with Indian Reservations, take away the land and restrict traditional activities for Alaska Natives.

Does not support the YCC program. Believes it is making under aged kids work with picks and shovels when equipment can do a better job of it.

Edward Sam: Said that Arctic Village people have worked for 13 years to keep Red Sheep Creek and Cane Creek closed to nonlocal residents. We have now lost that closure and nonlocal people can come in the hunt in those areas. Said he does not trust the government, they change managers and change policies, and subsistence users lose.

Asked **[136912.001 Refuge Infrastructure and Administration -- Staffing]** why the FWS can't hire one person from the community to work with the agency to help protect and manage the Red Sheep and Cane Creek areas. He mentioned the Lacey Act as a means of agency – tribal cooperation.

[136912.002 NEPA Process -- DEIS Comment Period] Said he wants a copy of the CCP meeting minutes to come back to the community. Also, Edward wants a copy of the large map on display showing the Refuge boundary, wilderness area and special use areas, the private land (Native Allotments).

[136912.003 Refuge Management Policies/Guidelines -- Environmental Contaminants ID and Cleanup] Said the Timber Lake area about 3 ½ miles up drainage has an old camp with blue tarps and a cache with 55 gal drums of old survival gear that has been broken into by bears. The area's a mess and he wants the FWS to clean it up. He is concerned about contamination in the area.

[136912.004 Transportation and Access -- Baseline Conditions] In the Old John Lake area, he said that Native people need to be involved with the Native Allotment trespass issue. They need a cabin to be manned by local people to watch the area during the hunting season. Local people need to be involved in the protection of the area.

He said that Lillian Garnett has misused her Native Allotment allowing somebody nonlocal named "Colonel XXX" to use it.

Edward Sam: Ended his comments saying he supports Gideon James comments. **[136912.005 Refuge Infrastructure and Administration -- Staffing]** Edward said the Refuge's Subsistence Coordinator position, such as the one Vince Mathew's is in, needs to be a Native person. A Native person with local knowledge of resources and traditions for this area. Needs to be a Native person helping other Native people. The FWS need more local Native people working for the agency.

COMMUNICATION NUMBER 136813

Allen Smith

From: "Allen E. Smith"

To: "Sharon Seim"

Subject: Allen Smith Comments on Arctic National Wildlife Refuge Draft CCP-DEIS

Mr. Richard Voss, Refuge Manager

U.S.Fish and Wildlife Service

Arctic National Wildlife Refuge

ATTN Sharon Seim

101 12th Ave., Rm 236

Fairbanks, AK99701-9963

ArcticRefugeCCP@fws.gov

Dear USFish & Wildlife Service,

Attached as a WORD document are my comments on the Draft CCP/DEIS for the Arctic National Wildlife Refuge due today. Please acknowledge receipt of these comments.

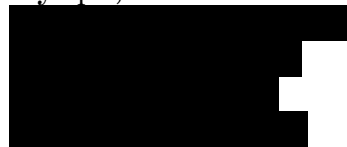
Thank you, Allen Smith

Allen E. Smith

Writer - Consultant

6123 Buckthorn Ct. NW

Olympia, WA98502-3434



[Attachment]

SENT VIA E-MAIL on November 15, 2011 – RETURN RECEIPT REQUESTED

snoshuak@comcast.net

Mr. Richard Voss, Refuge Manager
U.S. Fish and Wildlife Service
Arctic National Wildlife Refuge
ATTN Sharon Seim
101 12th Ave., Rm 236
Fairbanks, AK 99701-9963
ArcticRefugeCCP@fws.gov

RE: COMMENTS – ARCTIC NATIONAL WILDLIFE REFUGE – DRAFT REVISED
COMPREHENSIVE CONSERVATION PLAN, DRAFT ENVIRONMENTAL IMPACT
STATEMENT, WILDERNESS REVIEW, AND WILD AND SCENIC RIVER REVIEW

Thank you for the opportunity to offer my comments and recommendations below for the record and for your consideration on the Draft Revised Arctic National Wildlife Refuge Comprehensive Conservation Plan (CCP), Draft Environmental Impact Statement (DEIS), Wilderness Review, and Wild and Scenic River Review (PLAN/DEIS) as outlined in the USFWS documents of same name dated June 2011.

I have more than thirty years of experience with Alaska's wildland issues including the Arctic National Wildlife Refuge beginning with the passage of the Alaska National Interest Lands Conservation Act (ANILCA) when I served as Executive Officer in the Land and Natural Resources Division of the U. S. Dept. of Justice from 1979 to 1982. I served The Wilderness Society for twenty years first as a Vice President from 1986 to 1989, then as Alaska regional director and senior policy analyst from 1989 to 2004, and then as a consultant to The Wilderness Society on the Arctic Refuge from 2004 to 2006. I have personally visited the Arctic Refuge numerous times and plan to visit it again. I am now a freelance conservation writer and consultant on public land issues. I write here as a private citizen, but also note for the record that I am a member of The Wilderness Society, Natural Resources Defense Council, Wilderness Watch, and the National Wildlife Refuge Association and endorse their joint organizational comments submitted on this plan as well for purposes of standing.

I strongly support Alternative E in the Arctic National Wildlife Refuge Draft Revised CCP/DEIS and urge US Fish & Wildlife Service (USFWS) to adopt Alternative E and recommend proposed Wilderness Areas for all of the qualified and suitable lands within the Brooks Range, Porcupine Plateau, and Coastal Plain Wilderness Study Areas of the Arctic Refuge. With these proposed Wilderness Areas, the designation of new Wild & Scenic Rivers within those Wilderness Areas would not be necessary since Wilderness would provide the ultimate protection. The Special Values Section 1.5 of Chapter 1 of the Draft Revised CCP/DEIS outlines in detail what makes the

Arctic Refuge a special place and those “special values” should be the compass to guide all future management actions and limits to use on the Refuge. The Arctic National Wildlife Refuge is a wilderness refuge and should be designated, managed and treated as such.

There are several other critical aspects of the Draft Revised CCP/DEIS that I support and urge USFWS to adopt as well. First, Goals 1 and 2 are critically important to maintain the integrity of the Refuge’s ecological processes and wilderness character respectively and Goal 5 is a complimentary aspect of maintaining the wilderness character of the Refuge. Second, emphasis should be placed on the Management Guidelines that allow the natural behavior, interactions, and population dynamics of all wildlife species to continue without any predator control (2.4.12 and 2.4.12.7) and that leave habitats natural without any alteration or manipulation (2.4.11).

There are a number of troubling if not legally deficient aspects to the Draft Revised CCP/DEIS that should be addressed by USFWS and corrected since failure to do so will certainly lead to a loss of wilderness character on the Refuge. First, there is a failure to recognize the clear historical record that the wildlife management goals of the State of Alaska and ADF&G are not always compatible with the legal goals that USFWS is bound by under ANILCA, the Wilderness Act, and other federal law and there is not enough emphasis on USFWS responsibilities to follow federal law, not Alaska law in its cooperation with the State. Second, once again USFWS is putting off to a distant time horizon the priorities of dealing with the critical issues of managing the impacts of visitor use and river use just as it did over twenty years ago by shelving a critically needed river management plan, an issue that is now and will continue to significantly affect wilderness character if not addressed with more immediacy (Chapter 6 at Table 6-1 Timelines for Step-Down Plans). Third, All of the Appendix G Compatibility Determinations lack sufficient specificity of uses in the draft determinations to be approved by this Plan and inappropriately suggest that all future as yet to be specified activities are compatible uses leaving those unspecified uses to only be revealed and allowed by permit at a later date.

ANALYSIS OF ISSUES AND RECOMMENDATIONS:

Analysis of the recommendations, issues, and concerns in the Summary Statement above are detailed in the following five numbered analysis sections.

1 – ALTERNATIVES AND WILDERNESS:

Alternative E is the only Alternative in the Draft CCP/DEIS that adequately addresses long term protection of the unique wilderness values of the Arctic Refuge in a “Comprehensive Conservation Plan” as defined by ANILCA in 1980 and the National Wildlife Refuge Improvement Act in 1997. All other Alternatives fall short of the scope of Alternative E and short of the scope of prior Wilderness Area Reviews on the Refuge.

The first Wilderness Area Review was conducted in the early 1970’s on the Arctic National Wildlife Range to comply with the requirements of the Wilderness Act of 1964 and USFWS found then that with few exceptions the entire Arctic National Wildlife Range contained “outstanding wilderness qualities” and was suitable for designation as a Wilderness Area but that finding was never forwarded to Congress for action.

The second Wilderness Area Review on the Arctic National Wildlife Refuge conducted as part of the first CCP in the 1980’s as required by Section 1317 of ANILCA also found that the entire Refuge was suitable for designation as Wilderness, but left the coastal plain out for reasons that

many disagreed with. The entire Section 1317 Wilderness Area Review for all national parks and national wildlife refuges in Alaska was then buried in a drawer at USDI during the Administration of President Reagan and never forwarded to Congress as legally required by ANILCA.

This new Wilderness Area Review confirms the veracity of the prior reviews and corrects those past administrative failings. The Secretary USDI should now use that Review to forward a Wilderness Area recommendation for the Arctic National Wildlife Refuge through the President to Congress, as required by Section 1317 ANILCA and the Wilderness Act. All of the lands determined to be suitable for Wilderness Area designation within the Brooks Range, Porcupine Plateau, and Coastal Plain Wilderness Study Areas in the Wilderness Review published in Appendix H should be forwarded as Proposed Wilderness Areas.

Only the lands near Arctic Village (Map H-2) and Kaktovik (Map H-3) determined by the Wilderness Review to be non-qualified and/or non-suitable within the Brooks Range, Porcupine Plateau, and Coastal Plain Wilderness Study Areas should be excluded from the Proposed Wilderness Areas to provide for other uses by those villages.

Once those Proposed Wilderness Areas of Alternative E are enacted by Congress as Wilderness Areas, Wilderness Act protections will ensure that the outstanding wilderness values and character and extraordinary wildlife qualities of the Arctic National Wildlife Refuge will be protected in perpetuity and that is what USFWS should recommend. The Arctic Refuge deserves nothing less.

2 – GOALS:

USFWS has developed a strong set of draft goals for the Arctic Refuge plan. Implementation of the draft goals should be keyed directly off the Arctic Refuge purposes as stated in the Alaska National Interest Lands Conservation Act (ANILCA) of 1980 and the original purposes used in 1960 to establish the Arctic National Wildlife Range with its emphasis on wilderness, which were incorporated into the Arctic Refuge purposes in ANILCA. I support these draft goals with the following suggested changes.

[136813.001 Refuge Vision and Goals -- Goal 1 (including objectives)] Goal 1: The word “essentially” should be dropped since Refuge management should remain completely free of the intent to alter the natural order.

Goals 2, 3, 4, and 5: Intent is fine as written.

[136813.002 Refuge Vision and Goals -- Goal 6 (including objectives)] Goal 6: Should be reworded to “The effects of climate change on Refuge resources are evaluated through ‘non - invasive’ scientific research and monitoring.” **[136813.003 Refuge Vision and Goals -- Goal 7 (including objectives)]** Goal 7: Should also be reworded to “conduct non-invasive research and monitoring.”

Goals 8 and 9: Intent is fine as written.

3 – MANAGEMENT GUIDELINES:

I support sound management of Arctic Refuge resources but wish to emphasize a number of specific Management Guidelines that are critical to the sound implementation of all Management Guidelines and to protecting the purpose for which the Refuge was established. The first

paragraph of Guideline 2.4.12, Fish and Wildlife Population Management, on Page 2-52 and the first paragraph of Guideline 2.4.12.7, Fish and Wildlife Control, on Page 2-55 taken together clearly state the intent to allow the natural behavior, interactions, and population dynamics of all wildlife species to continue without species manipulation. There is no place for predator control on the Arctic Refuge or in Wilderness Areas. Two sentences in Guideline 2.4.11.1, Habitat Management, on Page 2-50 also are key to all management decisions: "The intent of management will be to leave habitats unaltered and unmanipulated. Natural habitats will not be modified or improved to favor one species over another." Natural habitats should be left alone in the Arctic Refuge as well as in Wilderness Areas. Taken together, these specific Management Guidelines are critically important to all management guidelines and management decisions on the Refuge.

[136813.004 Wildlife -- Predator Control] The Draft Revised CCP/DEIS fails to recognize the clear record of conflict over differences between the wildlife management goals of the State of Alaska ADF&G and the legally established wildlife management goals that USFWS is bound by under ANILCA, the Wilderness Act, and other federal law. These two sets of goals are not always compatible, particularly with regard to State intensive species game management and predator control. The Draft Plan does not have enough emphasis on USFWS's responsibilities to follow federal law, not Alaska law in its cooperation with the State. The Memorandum of Understanding signed between the State of Alaska and USFWS in March of 1982 does not require that USFWS give undue deference to the State. Again, there is no place for predator control in the Arctic Refuge or its Wilderness Area.

4 – STEPDOWN PLANS:

[136813.005 Step-Down Plans -- General] Chapter 6: Implementation and Monitoring is disturbing on two levels. First, the priorities assigned to three critical Step-Down Plans are not representative of their importance to maintaining the wilderness character of the Arctic Refuge. The Comprehensive River Management Plan (Priority 3), the Wilderness Stewardship Plan (Priority 2), and the Visitor Use Management Plan (Priority 2) are all necessary component parts of caring for the wilderness character and wildlife values of the Refuge and should be at Priority 1 levels. Second, these priority levels reflect that USFWS is continuing to put off dealing with the critical issues of managing the impacts of visitor use and river use just as it did over twenty years ago by shelving the then critically needed River Management Plan.

Over the past two decades, it has been my observation on the ground that the Arctic Refuge has seen an erosion of wilderness character from the failure of USFWS to prioritize and address these management issues in a timely manner. Through this inattention, these issues are continuing to significantly affect wilderness character on the Refuge and will increasingly affect wilderness character if not addressed with more immediacy (Chapter 6 at Table 6-1 Timelines for Step-Down Plans, Page 6-6). Because it would set the standards for protective management of wilderness character, the Wilderness Stewardship Plan should lead the way for Visitor Use and River Management Plans and all should be started right away. This becomes even more important as we now consider the designation of significant new Wilderness Areas for the Arctic Refuge.

5 – COMPATIBILITY DETERMINATIONS:

The standard for compatibility determinations as defined in Section 6(3)(a)(i) of the National Wildlife Refuge Improvement Act of 1997 requires that the USFWS "not initiate or permit a new use of a refuge or expand, renew, or extend an existing use of a refuge, unless the Secretary has

determined that the use is a compatible use,” that is the use must be compatible with the primary purposes for which the refuge was established. The purposes for which the Arctic National Wildlife Refuge was established are: i. to conserve fish and wildlife populations and habitats in their natural diversity including, but not limited to, the Porcupine caribou herd (including participation in coordinated ecological studies and management of this herd and the Western Arctic caribou herd), polar bears, grizzly bears, muskox, Dall’s sheep, wolves, wolverines, snow geese, peregrine falcons and other migratory birds and Arctic char and grayling; ii. to fulfill the international treaty obligations of the United States with respect to fish and wildlife and their habitats; iii. to provide, in a manner consistent with the purposes set forth in subparagraphs (i) and (ii), the opportunity for continued subsistence uses by local residents; and iv. to ensure, to the maximum extent practicable and in a manner consistent with the purposes set forth in paragraph (i), water quality and necessary water quantity within the Refuge.

[136813.006 Refuge Management Policies/Guidelines -- Compatibility Determinations (includes Appendix G)] Not all uses are compatible with Arctic Refuge purposes and the draft blanket Compatibility Determinations detailed in Appendix G do not take that into account nor do they take into account the needs for the re-evaluation of existing uses that are now quite possibly beyond the limits of compatibility. While detailed in many ways, particularly for stipulations, Appendix G is not site specific and project specific enough to show where or to what extent an activity or use would take place on the Refuge.

For example, the draft Compatibility Determinations in Appendix G for commercial services for air transportation, big-game hunting guides, recreational fishing guides, and recreational guides all suggest use levels that are not controlled or limited by USFWS. For instance, Under the Compatibility Determination for Commercial Air Transportation Services, Appendix G states, “There is currently no limit to the number of trips or clients permittees can take to the Refuge, nor is there a limit to the number of commercial air operators permitted to operate on the Refuge.” For hunting and fishing guide services, the State of Alaska is managing the take under its goals for “maximum sustained yield,” not the goals of USFWS. For recreational guides there is no limit other than the permit. Similarly, the draft Compatibility Determination for scientific research on the Refuge is also flawed by a lack of specificity in describing its scope of uses as: “This compatibility determination addresses the wide variety of research activities that have historically occurred or may occur on the land now comprising Arctic Refuge.” Is this scientific research compatibility determination process how USFWS allowed NASA to drop rockets into the Arctic Refuge from Poker Flats?

All of these uses should come under limits and use exclusions to be established by the step-down “use management plans” identified in Chapter 6 Implementation and Monitoring. However, there are two serious problems with USFWS’s current approach to this: (1) all of those step-down plans identified in Chapter 6 are currently a long way off in their completion and (2) Compatibility Determinations are only reviewed and updated every ten years. This decade-long time lag leaves the Refuge vulnerable to these permitted uses causing serious impacts to its wilderness character and to the wildlife protected by its first purpose before those uses are re-evaluated and limited. This is an inadequate, if not legally challenged approach and should be changed to be more specific, timely, and allow separate public comment on specific Compatibility Determinations.

CONCLUSION:

The Arctic National Wildlife Refuge is an extraordinary wilderness by any measure. Alternative E with its recommendations for Wilderness Areas across the whole Arctic Refuge is the most

appropriate Alternative that can be adopted by USFWS from this Draft Revised CCP/DEIS and I strongly urge you to do that. Further, I urge USFWS to seriously address the issues and concerns I have raised in the analysis sections above that affect the protection of wilderness character and wildlife. Wilderness is about restraint not only in what we allow to occur there but also what we do not allow there. Of what avail is a Wilderness Area in the Arctic Refuge if we do not keep it wild?

Again, thank you for this opportunity to comment on the Draft Revised CCP, Draft EIS, Wilderness Review, and Wild and Scenic River Review for the Arctic National Wildlife Refuge. I look forward to USFWS taking appropriate actions on the recommendations and issues I have raised above for this important plan.

Sincerely,

/signed/

Allen E. Smith

CC:

Nicole Whittington-Evans
Alaska Regional Director
The Wilderness Society

[REDACTED]
nicolew@tws.org

Charles M. Clusen
Director, Alaska Project
Natural Resources Defense Council

[REDACTED]

Fran Mauer
Alaska Chapter
Wilderness Watch

[REDACTED]

George Nickas
Executive Director
Wilderness Watch

[REDACTED]

Evan Hirsche
President
National Wildlife Refuge Association

[REDACTED]

COMMUNICATION NUMBER 136998

Thor Stacey

From: Website User
Sent: Tuesday, November 15, 2011 9:41 PM
To: arcticrefugeccp@fws.gov
Subject: Comments from Individual
Withhold my info: no
Prefix: Mr
First Name: Thor
Last Name: Stacey
Suffix: none
Title:
Address 1: 338 Winchester Way
Address 2:
City: Wiseman
State: AK
Postal Code: 99502
Country: USA
Additional Info:

Comment: To Whom It May Concern:

My name is Thor Stacey and I was born in Indian, AK in 1978. I was educated in public schools in Anchorage, although the most influential times of my childhood were spent on the south side of the Brooks Range at my father's mining properties on the Hammond River, 7 miles NW of the historic mining village of Wiseman. My interest in the Brooks Range, its animals and resources, has spanned my entire life and continues to this day. As an adult, I have followed in my father's footsteps and become a responsible resource developer, though I make my living as a hunting guide not a miner. I currently hold ARC-02 (the land between the Hulahula and Kongakut rivers, north of the continental divide, extending to the arctic coast) as one of my guiding concessions. My guide concession is administered as a special use permit by ANWR and awarded in a competitive process for 10 years.

This document consists of my personal comments on the draft CCP for the Arctic National Wildlife Refuge. In addition to these comments, I'm also including a short introduction that should help the reader understand my personal background and vested interest in the future of ANWR as well as some of the biases that my comments are potentially influenced by. And finally, in summary, I have also enumerated a few recommendations and concerns that I see looming in the next 10-15 years. Though it is my goal to be as concise and "to the point" as possible, I ask for leeway and patience from my reader as I am not a professional writer, nor am I certain of the most effective format for comment on this Draft CCP.

Thank You,
Thor Stacey

CCP Comments

Issues

1. Ecological Issues: In general, I agree with all of the management directions itemized for the Ecological Issues identified. **[136998.001 Refuge Management Policies/Guidelines -- Public Access and Transportation Management]** I would like to emphasize the threat posed by domestic “pack goats” or other domestic ruminants to Dall Sheep. It is my belief that there is a HIGH probability of disease and/or parasite transfer to wild sheep populations. The risk of massive, catastrophic sheep mortality is too high and the damage would be virtually, irreparable. Please ban domestic “pack” ruminants from ANWR. Next, I would like to emphasize my support for further study of genetic manipulation from sport hunting harvest. Specifically, **[136998.002 Wildlife -- Hunting Effects]** I would like to see the refuge liaison (fund) ADF&G and/or federal researchers to ascertain the impacts (genetic, herd fecundancy, predation resilience, range utilization etc.) of full curl harvest of Dall Sheep rams and to help quantify the value of adult males (6+ years in caribou, 8 + years in sheep) in Dall Sheep and Barren Ground Caribou populations. It is my belief that current game managers do not place an adequate biological value on maintaining adult males in ungulate populations after the hunting season. This is a cutting edge study and very important information to help the refuge maintain its mandate for natural ecological diversity. This concluded my comments on Ecological Issues.
2. Management Issues: My overall perspective on the management issues presented are; **[136998.003 Recreation and Visitor Use -- Monitoring]** the refuge would do better to fund and implement a more effective enforcement division for its existing regulations and special use permit conditions, than create more specialized management zones (Wilderness, Wild and Scenic Rivers). It is clear to me that the next 10-15 years will see a rise in interest and visitation to the refuge. This means that in both the short and long term future, enforcement will be critical to implementing the results of the final compromises of this CCP. I recommend dividing the refuge into three enforcement zones with both north and south side parity. One in Arctic Village and Kavik, one in Venetie and Kavik and one in Coldfoot and Happy Valley. Though this will require over 1 million dollars annually, it will be the ONLY way this CCP will be effectively implemented. I also recommend the purchase and use of at least one gas powered helicopter for fish and game enforcement. This is more effective and safer than fixed wing patrol and will ensure air superiority over the general public. **[136998.004 Cabins/Camps --]** Supporting additional areas of wilderness designation is tempting for me, due the extra statutory protections afforded but I’m opposed to the resulting moratorium on the construction of trapping/emergency cabins for subsistence use. This should be amended to provide and special avenue for cabin approval. I support the removal of all the Peters Lake buildings as they are a synthetic presence in the refuge and have, in my opinion, been abused by government agents and used as kind of a “Club Fed.” This accusation is not groundless, though I have not personally witnessed such behavior.
3. Visitor Use Issues: I feel obligated to assert my support for continued sport hunting and non-resident hunting in ANWR. Since I have a strong belief in the value of the refuge as public land and I’m certain that non-resident sport hunting helps reinforce this value to an influential and important user group. Once again I would like to emphasize my belief in the need for stepped up enforcement presence in the refuge. This will not only ensure compliance but help lend credibility to the management compromises that have been decided on in during the CCP process. **[136998.005 Recreation and Visitor Use -- Air Transportation: Flying, Overflights, Landings]** I would also like to stress the need to

restrict big game transporters and air taxis in the future. Specifically, transporter permits should be awarded only to part 135 air taxis who operate in the refuge for at least 3 months of the calendar year. This precludes “hunting only” seasonal operators and encourages healthy and safe transportation infrastructure on refuge lands. This will significantly reduce user conflicts as well, due to transporters understanding “non-consumptive” uses and will foster better community relations that will reduce conflicts with subsistence hunters.

4. Development Issues: I oppose oil and gas development that results in a “foot print” on refuge lands but would support laterally (directional) drilling into oil-bearing structures under the refuge as long as water quality could be assured. For this reason: I support updating the seismic data on the coastal plain.
5. Policy Issues: No comment.
6. Other Issues: No comment.

Goals and Objectives

1. I have no objections to this goal or he stated objectives. I would like to enthusiastically support “identifying stressors for species and ecosystems” as an objective, especially as in an arctic environment. **[136998.006 Refuge Vision and Goals -- Goal 1 (including objectives)]** I would also like to see some co-operation and comparison with Dr. Lohuis’s (ADF&G) stress/caloretic burn rate studies on Dall Sheep in south central Alaska.
2. **[136998.007 Refuge Vision and Goals -- Goal 2 (including objectives)]** Goal #2 is loaded with an almost spiritual undertone. “Wilderness Values” imply indoctrination, not discovery. I would urge less classes and “training” for refuge staff and more solo trips, devoid of excessive safety paraphernalia. The valuation of wilderness cannot be taught and wilderness values taught in class will surely differ from local teaching in Arctic Village or Kaktovik, thus reinforcing the roots of inequity. I support providing avenues for discover, including paying for solo trips for refuge staff, as opposed to “wilderness values class.”
3. Goal #3 is strait forward and easily supported but **[136998.008 Refuge Vision and Goals -- Goal 3 (including objectives)]** I would ask that Wild Rivers within the refuge not be advertised.
4. Goal #4 is also easily supported. I support subsistence harvest as a right of local people, both native and white. **[136998.009 Refuge Vision and Goals -- Goal 4 (including objectives)]** I also support effective monitoring of these harvests and would encourage an addition of and objective as follows: conduct a study of subsistence harvest utilization, methods and adapting means of harvest to include wound loss, failures to salvage/want and waste and mechanized pursuit of game.
5. I support goal #5, especially the objective; coordinate with partners to improve the effectiveness and efficiency of law enforcement.
6. Goal #6’s merits remain to be seen. Climate change, as an area of study, should never be ignored.
7. No Comment
8. No Comment

9. **[136998.010 Refuge Vision and Goals -- Goal 9 (including objectives)]** Goal #9 touches on some very contentious issues in my mind. I read it to mean that the Refuge will, more or less, actively market itself to the general public. In my mind, this runs absolutely counter to the intent of refuge and completely oversteps the agency's mandated responsibilities. I strongly object to goal #9 and its stated objectives and urge that it be struck from the CCP! This objection is rooted in my belief that traveling and discovering wilderness should involve effort and by easing this process and "packaging" wilderness the intent is defeated and the resource (social and physical) is degraded and threatened with total destruction.

Email: [REDACTED]



COMMUNICATION NUMBER 136815

**Carrie Stevens, Special Projects, Natural Resources Dept.
Council of Athabascan Tribal Governments**

From: Carrie Stevens

To: "ArcticRefugeCCP@fws.gov" ; "hollis_twitchell@fws.gov" ; "joanne_bryant@fws.gov" ;
"polly_wheeler@fws.gov" Subject: CATG ANWR Draft Revised CCP Comments

Please accept the attached Council of Athabascan Tribal Government Comments on the ANWR
Draft Revised CCP.

Carrie Stevens
Special Projects
Natural Resources Department
Council of Athabascan Tribal Governments

- RES 11-09.pdf - CATG ANWR CCP Comments.pdf

Attachment:

COUNCIL OF ATHABASCAN TRIBAL GOVERNMENTS NATURAL RESOURCES
DEPARTMENT YUKON FLATS, ALASKA

ARCTIC NATIONAL WILDLIFE REFUGE DRAFT REVISED COMPREHENSIVE
CONSERVATION PLAN

INITIAL COMMENTS ~ NOVEMBER 15TH, 2011

The Council of Athabascan Tribal Governments (the Council) is a tribal consortium founded in September 1985 on the principals of tribal self-governance. The Gwich'in and Koyukon Athabascan peoples of the Yukon Flats live in ten remote villages, whose Tribal Governments formed the Council. They are: Arctic Village, Beaver, Birch Creek, Canyon Village, Chalkyitsik, Circle, Fort Yukon, Rampart, Stevens Village, and Venetie. Tribal leadership has clear vision: healthy, self-sufficient villages founded upon strong local self-governance.

The purpose of the Council as mandated by their Constitution: shall be to conserve and protect tribal land and other resources; to encourage and support the exercise of tribal powers of self government; to aid and support economic development; to promote the general welfare of each member tribe and it's respective individual members; to preserve and maintain justice for all and, to otherwise, exercise all powers granted by it's member villages and the purposes expressed in the preamble.

Our traditional lands encompass what is now the Yukon Flats National Wildlife Refuge and the Arctic National Wildlife Refuge (herein the Refuge). The area stretching from the White Mountains in the South to the Brooks Range in the North, from the Western edge of the Yukon Flats near the Trans-Alaska Pipeline East to the United States-Canada border is of significant historic, cultural and geographic importance to the Council's Tribal Governments. Since time immemorial the Council's Tribal Governments and tribal people have been stewards of these lands, living in reciprocity with these lands and the resources therein.

The Tribes of the Yukon Flats assert their inherent authority as stewards to manage their traditional lands to ensure protection of cultural resources, traditional and customary resources, and their use. The Tribes of the Yukon Flats require all Federal and State agencies engage in meaningful consultation on a Government to Government basis on any action that will affect their cultural resources, traditional and customary resources, and their use within their Traditional Lands.

DRAFT REVISED CCP INITIAL COMMENTS

[136815.001 Consultation and Coordination -- Tribal Coordination/Govt to Govt] The Council submits that cooperation and coordination with the Council and Yukon Flats Tribal Governments in development and drafting of the Draft Revised CCP was limited at best. While the attempt to coordinate with affected Tribal Governments is appreciated, the process was inadequate. The Council's Executive Director and Natural Resources Program were never directly contacted for participation or facilitation in the planning process. These limitations are reflected in the Draft Revised CCP's inadequate level of inclusion of Tribal Government's and tribal member's knowledge of and reliance on their traditional lands which constitute the Refuge.

The Council, as a leader in Tribal Natural Resources management, has successfully negotiated and managed an Annual Funding Agreement (AFA) for selected programs, functions, services, and activities (PFSAs) of the Yukon Flats National Wildlife Refuge. This agreement is the first of its kind in the history of the nation, the first AFA for selected PFSAs of a federal Conservation Unit by a tribal entity. With this background, the Council should have been provided consideration for inclusion within the Core Planning Team for the Refuge CCP process.

The Council more specifically submits initial comments on the following four chapters of the Draft Revised CCP:

1. Chapter 2. Goals, Objectives, Management Policies, & Guidelines;
2. Chapter 3. Issues and Alternatives;
3. Chapter 4. Affected Environment; and
4. Chapter 6. Implementation and Monitoring.

CHAPTER 2. GOALS, OBJECTIVES, MANAGEMENT POLICIES, & GUIDELINES: 2.1 REFUGE GOALS AND OBJECTIVES

The Council appreciates consideration by the Service for their inclusion of the Council as a potential partner for the purposes of implementing Goal 4: The Refuge provides Continued Subsistence opportunities to federally qualified rural residents, consistent with ANILCA. Objective 4.4: Compile Existing Subsistence Use Data and Objective 4.5: Village Harvest Monitoring Programs. The Council has a proven professional history in this capacity, implementing this work in the region since 1993 thru 809 Agreements with the Office of Subsistence Management and Self-Governance Annual Funding Agreements (AFA) with the Yukon Flats National Wildlife Refuge. The Council supports the development of a strong partnership to identify and secure funding to accomplish these objectives, including the development of an AFA with the Arctic National Wildlife Refuge.

[136815.002 Consultation and Coordination -- Tribal Coordination/Govt to Govt] Due to significant historic, cultural and geographic importance to the Council's Tribal Governments the Council submits that the partnership with the Refuge should not be limited to the aforementioned two objectives. The Tribal Governments and their members hold extensive traditional knowledge of this place serving as stewards since time immemorial, and their involvement should be included within the daily management of multiple aspects of the Refuge. Specifically, as outlined in the Draft Revised CCP, the Council and Tribal Governments should be included as partners within the strategy to implement the following Goals and Objectives:

Objective 1.2: Inventory and Monitoring of Wildlife and Habitats;

Objective 1.4: Ecological Review;

Objective 1.6: Fire Management Planning;

Objective 1.7: Wildlife Management Proposals;

Objective 1.8: Water Quality and Quantity;

Objective 1.9: Water Rights;

Objective 1.12: Land Protection Plan;

Objective 1.13: Long-term Ecological Monitoring;

Objective 2.3: Wilderness Stewardship Plan;

Objective 4.1 – 4.5: ALL objectives related to Subsistence Use;

Objective 5.3: Visitor Use Management Plan;

Objective 5.5: Visitor Management Coordination with Neighbors;

Objective 5.7: Visitor Study;

Objective 5.8: Visitor Use Management;

Objective 6.1: Effects of Climate Change;

Objective 6.4: Collaboration on Climate Change;

Objective 7.2: Collaborative Research;

Objective 7.3: International Treaties and Agreements;

Objective 7.4: Baseline Water Quality Study;

Objective 8.1 – 8.9: ALL objectives related to conservation of Cultural Resources;

Objective 9.1 – 9.8: ALL objectives related to enhancing understanding, appreciation, & stewardship of the Refuge.

The Council supports the development of a strong partnership to identify and secure funding to accomplish these objectives, including the development of an AFA with the Arctic National Wildlife Refuge.

CHAPTER 3. ISSUES AND ALTERNATIVES

The Council stands in unity with the Yukon Flats Tribal Governments and the 39 Tribal Governments of the Tanana Chiefs Conference in passing a Tribal Resolution in support of

Alternative C for managing the Refuge. The Council desires the coastal plain of the Refuge, in our language “Izhit Gwandaii Gwatsan Goodlit (The Sacred Place Where Life Begins)” be declared Wilderness Area to protect this sacred place of our people. Please see attached Council Resolution 11-09.

CHAPTER 4. AFFECTED ENVIRONMENT:

4.4 HUMAN ENVIRONMENT

[136815.003 Subsistence -- Subsistence Economies] The Council submits that the information presented in 4.4 Human Environment is incomplete and limited in scope. Within Section 4.4.3.7 Subsistence Harvest, Barter, and Trade Economies it is stated that “resources of caribou, moose, and salmon are bartered and exchanged between the villages of Venetie, Fort Yukon, and Arctic Village.” The discussion continues to include a further explanation of this barter and trade. This is an incomplete, inadequate, and limited description of the barter and trade amongst Gwich’in and Koyukon people who rely upon the resources of the Refuge. Additional Refuge resources that are important traditional and customary resources of the Gwich’in and Koyukon people and included in barter and trade include, but should not be limited to: furs such as wolverine, lynx, marten, and beaver; berries such as blueberries and salmon berries; plants and herbs such as Labrador tea; whitefish such as grayling; waterfowl; and small game such as ground squirrel. **[Preamble 136815.004]** Additionally the list of villages which participate in this barter and trade should include but not limited to: Chalkyitsik, Beaver, Circle, Birch Creek, Stevens Village, and Old Crow, Canada. The traditional and customary barter and trade of resources upon which Gwich’in and Koyukon people rely is far greater and more complex than the simplified statements within the Draft Revised CCP.

Furthermore, **[136815.004 Subsistence -- Village Use Areas]** the Council submits that the statements in Section 4.4.4 Subsistence Uses is also incomplete, inadequate, and limited for the reasons as cited above. All villages as listed above should be referenced as relying on the Refuge to meet their subsistence needs. Additionally, **[136815.005 Subsistence -- Village Use Areas]** the specific discussions and usage maps in Section 4.4.4.2 Contemporary Village Subsistence Use referencing Arctic Village, Chalkyitsik, Fort Yukon, and Venetie are incomplete, inadequate, and limited. Further consultation is necessary with the Yukon Flats Tribal Governments and the Council to ensure a more adequate representation of traditional and customary use of resources located within the Refuge is established here.

CHAPTER 6. IMPLEMENTATION AND MONITORING

[136815.006 Consultation and Coordination -- Tribal Coordination/Govt to Govt] The Council submits that they be included in, and meaningful Government to Government consultation be included in, the development of future Step-Down Plans as outlined in Section 6.3 Future Step-Down Plans, most notably: Integrated Resources Management Plan, Comprehensive River Management Plan, Ecological Inventory & Monitoring Plan, Research Plan, Wilderness Stewardship Plan, Visitor Use Management Plan, and Land Protection Plan. The Council requests that thorough outreach is conducted for adequate Tribal input into all Step-Down plans.

IN CONCLUSION

[136815.007 Consultation and Coordination -- Tribal Coordination/Govt to Govt] The Council supports the development of a strong partnership with the USFWS for stewardship of the traditional lands and resources within the Arctic National Wildlife Refuge. The Council requests that more effective and regular, outreach, communication, and Tribal Government consultation is conducted regarding the management activities of the Refuge, as well as the implementation and progress of the CCP, with the Council and the Tribal Governments.

COUNCIL OF ATHABASCAN TRIBAL GOVERNMENTS

P.O. Box 33
Fort Yukon, AK 99740
907-662-2587
fax 907-662-3333

RESOLUTION 11-09

SUPPORTING IMMEDIATE ADOPTION OF ALTERNATIVE C OF THE ARCTIC NATIONAL WILDLIFE REFUGE'S COMPREHENSIVE PLAN.

WHEREAS: the Council of Athabascan Tribal Governments (CATG) is a tribal consortium made up of the following villages in the Yukon Flats region: Arctic Village; Beaver, Birch Creek, Canyon Village, Chalkyitsik, Circle, Fort Yukon, Rampart, Stevens Village, and Venetie and authorized by the tribes of each village; and

WHEREAS: the purpose of the Council of Athabascan Tribal Governments is to conserve and protect tribal land and other resources; to encourage and support the exercise of tribal powers of self-governance; to aide and support economic development; to promote the general welfare of each member tribe and its respective individual members; and to preserve and maintain the cultural and spiritual values of the Tribes and its Tribal members; and

WHEREAS: The Arctic National Wildlife Refuge is currently drafting its 15 year CCP, which will help guide and manage the Refuge for the foreseeable future; and

WHEREAS: the vast majority of the Arctic National Wildlife Refuge lies within traditional Gwich'in Territory; and

WHEREAS: the Gwich'in of the region wish to express their opinion on how these lands are managed that contain our ancestors remains, our traditional trails, and trading routes, our subsistence areas, rivers, mountains, animals, natural features, heritage sites, and common history, and

WHEREAS: the Gwich'in desires that the coastal plain, including 1002 area of the Arctic Refuge, in our language "Izhit Gwandaii Gwatsan Goodlit: (the Sacred Place Where Life Begins) be declared a "Wilderness Area" to protect the calving and nursery grounds of caribou, nesting migratory birds, and the cultural heritage of the area, and

WHEREAS: the Gwich'in is requesting the "Minimal Management" designation for areas South of the Continental Divide, with the exception of the Firth/Mancha Research Area; and

WHEREAS: Alternative C in the Draft Arctic Refuge CCP promotes Wilderness for the Coastal Plain, Wild and Scenic River status designation for Canning River, Marsh Fork of the Canning River, Hulahula River, Okpilak River, and the Kaongakut River and the Minimal Management designation for the nonwilderness area of Arctic Refuge lands south of the continental divide.

NOW THEREFORE BE IT RESOLVED that the Council of Athabascan Tribal Governments Board of Directors request that the Department of the Interior and the US Fish and Wildlife Service immediately adopt "Alternative C" for the proposed 1011 Arctic National Wildlife Refuge CCP; and

BE IT FURTHER RESOLVED that the Council of Athabascan Tribal Governments Board of Directors request Government to Government consultation on the draft CCP process and content with the US Fish and Wildlife Service, and

LET IT FINALLY BE RESOLVED that this resolution is the standing policy of the Council of Athabascan Governments on the Arctic Refuge CCP until amended or rescinded.

Passed and approved this 17th day of October, 2011 by an official vote of the CATG Board of Directors at which a quorum was present.

Signature attesting the vote of the quorum is attached.

ATTEST:

Title: Chairman, Chief, Circle Village Council Date: _____

Title: Chief, Arctic Village Council Date: _____

Title: Chief, Beaver Village Council Date: _____

Title: Chief, Birch Creek Tribal Council Date: _____

Title: Chief, Canyon Village Traditional Council Date: _____

Title: Chief, Chalkyitsik Village Council Date: _____

Title: Chief, Gwichyaa Zhee Gwitch'in Tribal Government Date: _____

Title: Chief, Rampart Village Council Date: _____

Title: Chief, Stevens Village Council Date: _____

Title: Chief, Venetie Village Council Date: _____

COMMUNICATION NUMBER 136816

John Strassenburgh

From: "John"

To:

Subject: Arctic Refuge CCP comments

Dear Ms. Seim, attached and pasted in below are my comments on the draft revised Comprehensive Conservation Plan and draft EIS for the Arctic National Wildlife Refuge.

It's quite a large project and (even though I have many suggestions) I think FWS did a very good job of putting it together.

Would you please let me know if you received my comments in good order.

Thanks,

John Strassenburgh

John Strassenburgh

PO Box 766

Talkeetna, AK 99676

[REDACTED]

November 14, 2011

U.S. Fish and Wildlife Service

Arctic NWR - Sharon Seim

101 12th Ave, Rm 236

Fairbanks, AK 99701

Via email: ArcticRefugeCCP@fws.gov

To whom it may concern:

These are my comments on the draft revised Comprehensive Conservation Plan ("CCP") and draft Environmental Impact Statement ("EIS") for the Arctic National Wildlife Refuge ("Refuge").

I live in Alaska and I have visited the Refuge many times over the last thirty years on extended backpacking and river trips. The wilderness experiences I have had in the Refuge over the years have been, and continue to be, some of the most inspirational and memorable of my life.

[Preamble 136816.003, 004, 005, 006, 007, 008, 009, 010, 011, 012, 013, 014, 015, 016, 017, 018, 019, 020, 021, 022, 023, 024, 025, 026] Please note that unless otherwise indicated, page number references in my comments below refer to the 20 page Summary of Draft CCP from the CD sent to me by FWS (file entitled "Arctic_DraftCCP_SummaryRpt_052511.pdf"), also available at <http://arctic.fws.gov/pdf/ccp3b.pdf>

Management Alternatives

I support Alternative E, with respect to all three issues, Wilderness, Wild and Scenic Rivers, and Kongakut Visitor Use. My comments during the public scoping phase of this planning effort amply explain my view of what the Refuge is and what it represents. This explains why, given that view, I select Management Alternative E. I won't go into the details except to provide an excerpt from my scoping comments.

This place is so extraordinary because it is a vast, intact wilderness where the environment functions naturally, without man's modification or influence. It is a true wilderness. When one hikes the river valleys or the ridges or floats down a river, there is always more wilderness around the next bend or over the next pass. There is solitude, there is self reliance, there is extraordinary beauty of the landscapes, and there is always the promise of a spectacular vista or a wildlife observation.

With respect to Issue 1, Wilderness, permanent protection of the Coastal Plain, through inclusion in the National Wilderness Preservation System ("NWPS"), is absolutely crucial. Its habitat values are paramount; it is the "biological heart" of the Refuge. In order to maintain the biological integrity of the Refuge as a whole, the Coastal Plain (1002 area) must be protected as Wilderness, and managed as such.

I feel also that the Brooks Range and Porcupine Plateau should be added to the NWPS. Having said that, however, it is important, when developing management policy for the Brooks Range and Porcupine Plateau that FWS recognize their traditional and cultural use by the Gwich'in people and provide for the continuation of that use, while also preserving wilderness values of the areas.

With respect to Issue 2, Wild and Scenic Rivers, I would like to see the Hulahula, Marsh Fork of the Canning, Kongakut, and Atigun Rivers included as Wild Rivers in the National Wild and Scenic River System ("NWSRS"). These rivers are wild, pristine, and free, and represent extraordinary habitat and wildlife values, stunning landscapes, and a wilderness visitor experience that is increasingly rare in today's world. These rivers warrant permanent protection as Wild rivers.

With respect to Issue 3, Kongakut River Visitor Use, I have seen increased use of the river over the years and recognize a need for that use to be managed. I have taken two backpacking trips, both of which were in the 1980's, around the upper reaches/headwaters of the Kongakut, and have taken several rafting trips, the first of which was in 1991, roughly between Drain Creek and Caribou Pass, and twice to Icy Reef. Here are my thoughts on Visitor Use on the Kongakut:

[136816.001 Step-Down Plans -- Wilderness Stewardship Plan] A Wilderness Stewardship Plan should be developed and used not only on the Kongakut, but as a template for the management of other rivers and areas of the Refuge. And because the number one management priority should be protection of the wilderness, all other management should be subordinate to this overriding priority. Management of visitor use is a major part of wilderness stewardship, and I think that there should be one step-down plan entitled Wilderness Stewardship Plan, with a major (but not only) component of that plan being management of visitor use. In my mind, protection trumps access, and if it is necessary to limit or restrict the number of visitors, the type of activities, or the mode of access in order to protect the wilderness, then such limitations or restrictions should be put into effect.

[136816.002 Recreation and Visitor Use -- Monitoring] Under Alternative A (page 10 of the 20 page Summary of Draft CCP from the CD sent to me entitled "Arctic_DraftCCP_SummryRpt_052511.pdf") there is reference in the bullets to "occasional compliance checks" and "Visitor Use monitoring occurs every other year or less frequently" and "campsite conditions are monitored periodically." That language is broad, and one gets the sense that monitoring and compliance checking is very rarely conducted. If you don't know whether the rules are effective and being followed and if you don't identify the nature, extent, and location of the impacts, it is hard to manage visitor use effectively. Accordingly, I would like to see more emphasis placed on monitoring visitor use, identifying impacts, managing the impacts, and making sure the management is effective in protecting the wilderness itself, and maintaining the quality of the wilderness experience for those who visit the Refuge. I think, from the first bullet under Alternative B (which extends to the other action alternatives), that FWS recognizes this need, but

the bullet does not go far enough. Establishment and implementation of a comprehensive monitoring and enforcement program should be a high management priority, with increasing emphasis as visitor use increases.

[136816.003 Recreation and Visitor Use -- Outreach/Education] I think that developing educational materials for the public with targeted messages... (second bullet under Alternative B) is good. My question is how this information would be disseminated to the visitors so that they understand it and appreciate the importance of following the rules. A brochure at the Arctic Village airstrip is not enough. At Glacier Bay, NPS required us to watch an educational video before going kayaking. This type of requirement may be necessary for Refuge visitors. Currently, some guides are very good at educating their clients about both low impact methods and also why they are important. Perhaps FWS should develop a video or a standard orientation program that the guides could use to educate their clients.

[136816.004 Alternatives Analyzed -- Alternative B: Kongakut River Visitor Management] Fourth bullet under Alternative B is not possible without a strong monitoring program. And I question how an impacted area would be rehabilitated, other than early detection followed by restricting use of the impacted area until it rehabilitates itself naturally.

First bullet under Alternative D is good. There is a need and it should be a priority.

[136816.005 Recreation and Visitor Use -- Air Transportation: Flying, Overflights, Landings] Third bullet under Alternative D: I think that restricting or dispersing flight-seeing activities is a good idea. But I question the advisability of dispersing commuting flight paths (and I take it that “commuting” means pick up and drop off of river rafters, backpackers, etc.). The Kongakut is a mountainous area, and there are not a lot of ways into and out of particular landing spots. It seems to me that flight paths should be determined by the pilot according to safety and the direction the pilot is coming from or is headed after the pick-up or drop-off.

Identified Issues

[136816.006 Step-Down Plans -- General] Page 6 of Summary of Draft CCP lists various management issues and identifies the mechanism(s) for addressing each one. Many of these issues are recommended to be deferred to step-down plans. My concern is that step-down plans, for whatever reason but most likely due to lack of funding, may never happen. The CCP at page 6-6 contemplates several step-down plans. The Wilderness Stewardship Plan (and its Visitor Use Management component... see first bullet under Kongakut Visitor Use comment above) isn't scheduled for completion 2019 – 1021). So, in the best of circumstances, it would take nearly a decade before a completed plan can be implemented. That's too long, and the further out it is, the more uncertainty there is as to whether it will be completed.

The development of step-down plans is very important and should, relative to the other facets of the broad scope of FWS's management of the Refuge, be a high priority. Within the step-down plan category, as shown in Table 6.1, I generally agree with the assigned priorities, except that a Wilderness Stewardship Plan and its Visitor Use Management component should be the number one priority, and it should be started before 2014. The I&M and Research Plans should be priority number 2.

[136816.007 Refuge Vision and Goals -- General] Goals and Objectives (pages 8 and 9 of Summary of Draft CCP)

As I have noted above, I believe the number one management priority is to protect the wilderness, and that all other goals and management guidance, although important and necessary, are

subordinate to that. I suggest that this point be made in the CCP, possibly in an introduction to the Goal statements.

Otherwise, and with the exception of the comments below, I think the Goals and Objectives are very good.

[136816.008 Refuge Vision and Goals -- Goal 1 (including objectives)] Goal 1:

Strike the words “remains essentially free of the intent to” and replace with “does not” and insert the word “diversity” after the word “densities”, so the goal would read “Ecological process shape the Refuge, and its management does not alter the natural order, including natural population densities, diversity, and dynamics, and levels of variation of native fish, wildlife, and plants.” My suggested language removes the squishy, exculpatory language as it is now drafted in the CCP. I added “diversity” even though there was language in the last clause that referred to “levels of variation...” I can’t quite pin down precisely what that last clause means.

[136816.009 Refuge Vision and Goals -- Goal 1 (including objectives)] Goal 1 Objectives:

I haven’t seen in the CCP (I did an electronic search on “soundscape”) any consideration for monitoring and maintaining a natural soundscape. A natural soundscape is a key component of the visitor experience and it is also crucial for wildlife and its natural processes. Noise can disturb and stress wildlife, impede their communication, etc. I would like to see an objective added to Goal 1 that provides for the monitoring and maintenance of the natural soundscape. This possibly could be added instead to the Objectives under Goal 2, with supporting language in body of the CCP.

Goal 3:

[136816.010 Refuge Vision and Goals -- Goal 3 (including objectives)] I suggest that Goal 3 be broadened to include all rivers, and not be limited to just designated Wild Rivers. There are many, many wild and free and pristine rivers throughout the Refuge. Whether a river is within a Wilderness area, is a designated a Wild River, or not, all are integral to the wilderness, habitat, and biological value of the Refuge, and they all should be managed accordingly.

[136816.011 Refuge Vision and Goals -- Goal 3 (including objectives)] There should be goals and objectives to ensure that not just rivers, but also lakes and streams, are managed to be maintained undisturbed in their natural, pristine condition. In other words, the ecological functions, character, and values of all water bodies within the Refuge should be protected.

[136816.012 Refuge Vision and Goals -- Goal 4 (including objectives)] Goal 4 Objectives

The first bullet makes reference to advisory groups. I suggest that any advisory group be diverse, and include some members who are not subsistence users and not necessarily hunters. When establishing management policy, I think it is important to have the benefit of diverse perspectives.

[136816.013 Refuge Vision and Goals -- Goal 5 (including objectives)] Goal 5 Objectives

The second bullet is to develop a Visitor Use Management Plan. This objective should be deleted and replaced with the following: “Develop a Wilderness Stewardship Plan, a component of which would be a Visitor Use Management Plan;”

[136816.014 Refuge Vision and Goals -- Goal 5 (including objectives)] This Goal 5 is integral to not only the essence of the visitor experience, but also touches on most aspects of the Refuge management. There are a lot more objectives that should be included under Goal 5. This is an organizational challenge, because many management objectives could be listed under, for example,

Goal 1, Goal 2, Goal 5, or all three. For example, the suggestion I have (see above) of adding an objective to monitor and maintain a natural landscape could be under any or all these goals.

Further, to manage visitor use, and preserve the wilderness recreational activity qualities specified in the Goal 5 statement, there has to be compliance checking and monitoring of impacts, as well as a means to identify, assess, prioritize, and determine how best to remediate the impacts. Again, there is a lot of overlap among goals 1, 2, and 5, but my impression is that the objectives for Goal 5 are incomplete.

[136816.015 Refuge Vision and Goals -- Goal 8 (including objectives)] Goal 8 Objectives

The 6th bullet says “monitor at-risk sites.” I suggest adding the words “identify and” so that the bullet reads: “identify and monitor at-risk sites.”

[136816.016 Editorial Corrections -- General] New Management Guidelines (pages 15 - 17 of Summary of Draft CCP)

In reviewing the Summary, I am doing so because it represents the full CCP. Most of my concerns with the Summary, therefore, extend to the full CCP. It is a little confusing because the Summary is not always consistent with the CCP or it fails to include what I think is important information. I am including my concerns with the Summary (even the few instances where the full CCP clarifies the issue or otherwise satisfies my concern) because when the CCP is adopted, it is the updated Summary that people will be looking at for general reference.

[136816.017 Refuge Management Policies/Guidelines -- Fish and Wildlife Habitat Management] Key change number 1 (page 15)

I suggest inserting the words “population numbers” after the word “diversity” and striking “highest degree of” and adding the clause “provided that chemical treatment may be used only as a last resort after exhausting all other options.” Number 1 would then read: “Fish and Wildlife Habitat Management: Fish and wildlife habitat would not be actively managed, or altered. Rather, management would seek to sustain the natural diversity, population numbers, and biological integrity. Activities such as crushing, chemical, or mechanical treatments or the constructions of structures should not be allowed unless necessary to address invasive species or management emergencies, provided that chemical treatment may be used only as a last resort after exhausting all other options.” What I am trying to accomplish with this suggestion is strengthen the protective language to better ensure resolute, unwavering protection of all of the Refuge’s wilderness values.

Change number 1, as do changes 2, 3, and 6, uses the term “management emergencies.” This term is not defined in the Summary CCP, and I think it would be helpful to either define the term or make reference to Chapter 2, page 2-37, section 2.4.2 of the full CCP.

[136816.018 Refuge Management Policies/Guidelines -- Fish and Wildlife Population Management] Key change number 2 (page 15)

This is an important guideline, and I am glad to see it, but it appears inconsistent with the management guidance presented in “Summary of Selected Management Provisions” Table. See Activity or Use: “Access on Foot, by Dog Team, or with other Domestic Animals” at the top of page 17. This Activity or Use would be “Allowed” in Wilderness, Wild Rivers, and Minimal Management areas. Domestic animals can transmit disease to wild animals, for example pack goats to Dall sheep. I suggest you Google “disease transmission domestic livestock to wildlife.” There are many hits. I don’t think that domestic livestock should be categorically “Allowed.” At the very least, domestic livestock should be subject to a case-by-case basis permit system, with

careful evaluation and test of the livestock before being permitted to enter the Refuge. FWS should take a close look at this to determine the problem areas, and to perhaps have some species of livestock banned outright and some subject to a permit system with careful evaluation and test of each individual domestic livestock animal entering the Refuge.

Key change 4 (page 15)

I am glad to see this ban on public facilities.

Key changes 5 and 6 (page 15)

I support both of these.

General

[136816.019 Transportation and Access -- Mode of Transportation] All-terrain and off road vehicles do tremendous damage to the land, wetlands, and, to water (e.g., through erosion). I am glad to see the ban includes air boats and air cushion vehicles. Not only should this ban continue, but provision should be made for monitoring such use and enforcing the ban. What good is a ban if there is no mechanism in place to ensure compliance? I also think that the language should be broad (to include new future off-road travel machines that cannot be envisioned today), such as “use of any land or water vehicle or conveyance, including but not limited to ATVs, ORVs, air boats, and air cushion vehicles, that adversely impacts the natural resources of the Refuge is prohibited.”

I also support the ban on recreational use of helicopters, whether for access or overflights. Helicopters are exceptionally noisy and intrusive to visitors and wildlife alike, and should be prohibited except for emergencies or by FWS (as rarely as possible) for necessary Refuge management purposes.

[136816.020 Refuge Management Policies/Guidelines -- Table 2-1 - Activity/Use by Management Category] Page 16, line item 1 in the table, “Habitat Management – Mechanical Treatment.” There should be some guidance with respect to the qualification “with exceptions.” I would suggest language like “with exceptions, and only as a last resort” or (“only after other options have been thoroughly and meaningfully evaluated”). This should apply to all three categories: Wilderness, Wild Rivers, and Minimal Management. In addition, when exceptions to “not allowed” are contemplated, Minimum Requirements Analysis(MRA) should be required in the Wild River and Minimal Management categories as well as the Wilderness category.

[136816.021 Refuge Management Policies/Guidelines -- Table 2-1 - Activity/Use by Management Category] Page 16, line item 2 in the table, “Habitat Management – Chemical and Manual Treatment.” Similar to line item 1 above. Although the boxes in this table are no doubt expanded upon and explained in the CCP, I think that the table is somewhat misleading because it lacks clear and strong language in instances where an Activity or Use is allowed under exception circumstances (e.g., “may be allowed”). I think that “not allowed, with exceptions” is better than “may be allowed” and even better is “not allowed, except in emergencies and only as a last resort.” This should apply to all three categories (Wilderness, Wild Rivers, and Minimal Management).

[136816.022 Fire and Fire Management -- General] Page 16, line item 3 in the table, “Fire Management – Prescribed Fires and Wildland Fire Use,” which is shown as “allowed.” This is inconsistent with the full CCP, which states [see page 2-77 of the CCP (Table 2.1)] that Fire Management – Prescribed Fires and for Fire Management – Wildland Fire Use are both “may be allowed” for all Wilderness, Wild River, and Minimal Management. The Summary CCP Draft is not consistent with the full CCP draft. I think that the full CCP draft is correct and that this is probably a transcription error going from the full CCP to the Summary. In any event, there

should not be a blanket “allowed.” There should be language that compels a thoughtful and meaningful analysis and evaluation of all alternatives before this is allowed... and this should apply to all three categories. If these activities are to be allowed in special or emergency circumstances, then there should be strong guiding language accordingly.

[136816.023 Refuge Management Policies/Guidelines -- Fish and Wildlife Population Management] Page 16, line item 4 in the table, “Fish and Wildlife Control.” My concern here is similar to above, but more urgent. The vague language in the table (i.e., “may be allowed”) is misleading because it fails to emphasize the fact that, according to the full CCP draft, Fish and Wildlife Control would be used only in emergencies (see 2.4.12.7 of the CCP, page 2-55). Section 2.4.12.7 references section 2.4.2 for a definition of Human Safety and Management Emergencies. The language of this line item 2, Fish and Wildlife Control (page 16 of the Summary) should, for all three categories, be “NOT ALLOWED, except in emergencies.”

[136816.024 Refuge Management Policies/Guidelines -- Table 2-1 - Activity/Use by Management Category] In general, all of the Activities or Uses that “may be allowed” or are “not allowed, with exceptions” ought to have stronger, specific language attached. I think for most of these in the table, “not allowed, except in emergencies” would cover it.

[136816.025 Refuge Management Policies/Guidelines -- Table 2-1 - Activity/Use by Management Category] Page 17 (of the Summary), second line item “Motorized/Traditional Access: Use of snowmobiles, motorboats, airplanes, and non-motorized surface transportation methods including non-motorized boats for traditional activities and for travel to and from villages and home sites.” The lack of commas after “methods” and after “non-motorized boats” means that “traditional activities” modifies only non-motorized boats. I believe that the intent of the sentence is for traditional activities to apply to “snowmobiles, motorboats, airplanes, and non-motorized surface transportation methods” as well. This is confirmed by reference to section 2.4.14.1 of the CCP, page 2-59, which I believe is correct. Therefore, the sentence (page 17 of the Summary) should be: “Use of snowmobiles, motorboats, airplanes, and non-motorized surface transportation methods, including non-motorized boats, for traditional activities and for travel to and from villages and home sites.” This is the same as line item 2 on page 17 of the Summary of Draft CCP except for the insertion of the two commas. In addition, “traditional access” should be defined so that recreational snowmachine use can be prohibited.

Chapter 2.4 of the CCP

There are a few points within Chapter 2, section 4 that I would like to highlight because I strongly support them:

2.4.11.1 Habitat Management: I hope that this section is a very high management priority, especially the sentences: “The intent of management will be to leave habitats unaltered and unmanipulated. Natural habitats will not be modified or improved to favor one species over another.” In addition, I like the second sentence (of this section of the CCP), but as noted above, would suggest modifying it as I have indicated above in Key change number 1, under New Management Guidelines.

2.4.12.7 Fish and Wildlife Control: I also hope that this section is a very high management priority, especially the sentences: “On Arctic Refuge, all native species are integral and interdependent members of a natural community of life. Management will strive to enable the natural behavior, interactions, and population dynamics of all species to continue.”

Thank you for this opportunity to comment.

Sincerely,

[signed]

John Strassenburgh

- Comment CCP draft plan and EIS 111411.doc

Attachment:

PO Box 766

Talkeetna, AK 99676

November 14, 2011

U.S. Fish and Wildlife Service

Arctic NWR - Sharon Seim

101 12th Ave, Rm 236

Fairbanks, AK 99701

Via email: ArcticRefugeCCP@fws.gov

To whom it may concern:

These are my comments on the draft revised Comprehensive Conservation Plan (“CCP”) and draft Environmental Impact Statement (“EIS”) for the Arctic National Wildlife Refuge (“Refuge”).

I live in Alaska and I have visited the Refuge many times over the last thirty years on extended backpacking and river trips. The wilderness experiences I have had in the Refuge over the years have been, and continue to be, some of the most inspirational and memorable of my life.

Please note that unless otherwise indicated, page number references in my comments below refer to the 20 page Summary of Draft CCP from the CD sent to me by FWS (file entitled “Arctic_DraftCCP_SummryRpt_052511.pdf”), also available at <http://arctic.fws.gov/pdf/ccp3b.pdf>

Management Alternatives

I support Alternative E, with respect to all three issues, Wilderness, Wild and Scenic Rivers, and Kongakut Visitor Use. My comments during the public scoping phase of this planning effort amply explain my view of what the Refuge is and what it represents. This explains why, given that view, I select Management Alternative E. I won’t go into the details except to provide an excerpt from my scoping comments.

This place is so extraordinary because it is a vast, intact wilderness where the environment functions naturally, without man’s modification or influence. It is a true wilderness. When one hikes the river valleys or the ridges or floats down a river, there is always more wilderness around the next bend or over the next pass. There is solitude, there is self reliance, there is extraordinary beauty of the landscapes, and there is always the promise of a spectacular vista or a wildlife observation.

With respect to Issue 1, Wilderness, permanent protection of the Coastal Plain, through inclusion in the National Wilderness Preservation System (“NWPS”), is absolutely crucial. Its habitat values are paramount; it is the “biological heart” of the Refuge. In order to maintain the biological integrity of the Refuge as a whole, the Coastal Plain (1002 area) must be protected as Wilderness, and managed as such.

I feel also that the Brooks Range and Porcupine Plateau should be added to the NWPS. Having said that, however, it is important, when developing management policy for the Brooks Range and

Porcupine Plateau that FWS recognize their traditional and cultural use by the Gwich'in people and provide for the continuation of that use, while also preserving wilderness values of the areas.

With respect to Issue 2, Wild and Scenic Rivers, I would like to see the Hulahula, Marsh Fork of the Canning, Kongakut, and Atigun Rivers included as Wild Rivers in the National Wild and Scenic River System ("NWSRS"). These rivers are wild, pristine, and free, and represent extraordinary habitat and wildlife values, stunning landscapes, and a wilderness visitor experience that is increasingly rare in today's world. These rivers warrant permanent protection as Wild rivers.

With respect to Issue 3, Kongakut River Visitor Use, I have seen increased use of the river over the years and recognize a need for that use to be managed. I have taken two backpacking trips, both of which were in the 1980's, around the upper reaches/headwaters of the Kongakut, and have taken several rafting trips, the first of which was in 1991, roughly between Drain Creek and Caribou Pass, and twice to Icy Reef. Here are my thoughts on Visitor Use on the Kongakut:

A Wilderness Stewardship Plan should be developed and used not only on the Kongakut, but as a template for the management of other rivers and areas of the Refuge. And because the number one management priority should be protection of the wilderness, all other management should be subordinate to this overriding priority. Management of visitor use is a major part of wilderness stewardship, and I think that there should be one step-down plan entitled Wilderness Stewardship Plan, with a major (but not only) component of that plan being management of visitor use. In my mind, protection trumps access, and if it is necessary to limit or restrict the number of visitors, the type of activities, or the mode of access in order to protect the wilderness, then such limitations or restrictions should be put into effect.

Under Alternative A (page 10 of the 20 page Summary of Draft CCP from the CD sent to me entitled "Arctic_DraftCCP_SummryRpt_052511.pdf") there is reference in the bullets to "occasional compliance checks" and "Visitor Use monitoring occurs every other year or less frequently" and "campsite conditions are monitored periodically." That language is broad, and one gets the sense that monitoring and compliance checking is very rarely conducted. If you don't know whether the rules are effective and being followed and if you don't identify the nature, extent, and location of the impacts, it is hard to manage visitor use effectively. Accordingly, I would like to see more emphasis placed on monitoring visitor use, identifying impacts, managing the impacts, and making sure the management is effective in protecting the wilderness itself, and maintaining the quality of the wilderness experience for those who visit the Refuge. I think, from the first bullet under Alternative B (which extends to the other action alternatives), that FWS recognizes this need, but the bullet does not go far enough. Establishment and implementation of a comprehensive monitoring and enforcement program should be a high management priority, with increasing emphasis as visitor use increases.

I think that developing educational materials for the public with targeted messages... (second bullet under Alternative B) is good. My question is how this information would be disseminated to the visitors so that they understand it and appreciate the importance of following the rules. A brochure at the Arctic Village airstrip is not enough. At Glacier Bay, NPS required us to watch an educational video before going kayaking. This type of requirement may be necessary for Refuge visitors. Currently, some guides are very good at educating their clients about both low impact methods and also why they are important. Perhaps FWS should develop a video or a standard orientation program that the guides could use to educate their clients.

Fourth bullet under Alternative B is not possible without a strong monitoring program. And I question how an impacted area would be rehabilitated, other than early detection followed by restricting use of the impacted area until it rehabilitates itself naturally.

First bullet under Alternative D is good. There is a need and it should be a priority.

Third bullet under Alternative D: I think that restricting or dispersing flight-seeing activities is a good idea. But I question the advisability of dispersing commuting flight paths (and I take it that “commuting” means pick up and drop off of river rafters, backpackers, etc.). The Kongakut is a mountainous area, and there are not a lot of ways into and out of particular landing spots. It seems to me that flight paths should be determined by the pilot according to safety and the direction the pilot is coming from or is headed after the pick-up or drop-off.

Identified Issues

Page 6 of Summary of Draft CCP lists various management issues and identifies the mechanism(s) for addressing each one. Many of these issues are recommended to be deferred to step-down plans. My concern is that step-down plans, for whatever reason but most likely due to lack of funding, may never happen. The CCP at page 6-6 contemplates several step-down plans. The Wilderness Stewardship Plan (and its Visitor Use Management component... see first bullet under Kongakut Visitor Use comment above) isn’t scheduled for completion 2019 – 1021). So, in the best of circumstances, it would take nearly a decade before a completed plan can be implemented. That’s too long, and the further out it is, the more uncertainty there is as to whether it will be completed.

The development of step-down plans is very important and should, relative to the other facets of the broad scope of FWS’s management of the Refuge, be a high priority. Within the step-down plan category, as shown in Table 6.1, I generally agree with the assigned priorities, except that a Wilderness Stewardship Plan and its Visitor Use Management component should be the number one priority, and it should be started before 2014. The I&M and Research Plans should be priority number 2.

Goals and Objectives (pages 8 and 9 of Summary of Draft CCP)

As I have noted above, I believe the number one management priority is to protect the wilderness, and that all other goals and management guidance, although important and necessary, are subordinate to that. I suggest that this point be made in the CCP, possibly in an introduction to the Goal statements.

Otherwise, and with the exception of the comments below, I think the Goals and Objectives are very good.

Goal 1:

Strike the words “remains essentially free of the intent to” and replace with “does not” and insert the word “diversity” after the word “densities”, so the goal would read “Ecological process shape the Refuge, and its management does not alter the natural order, including natural population densities, diversity, and dynamics, and levels of variation of native fish, wildlife, and plants.” My suggested language removes the squishy, exculpatory language as it is now drafted in the CCP. I added “diversity” even though there was language in the last clause that referred to “levels of variation....” I can’t quite pin down precisely what that last clause means.

Goal 1 Objectives:

I haven’t seen in the CCP (I did an electronic search on “soundscape”) any consideration for monitoring and maintaining a natural soundscape. A natural soundscape is a key component of the visitor experience and it is also crucial for wildlife and its natural processes. Noise can disturb and stress wildlife, impede their communication, etc. I would like to see an objective added to Goal 1

that provides for the monitoring and maintenance of the natural soundscape. This possibly could be added instead to the Objectives under Goal 2, with supporting language in body of the CCP.

Goal 3:

I suggest that Goal 3 be broadened to include all rivers, and not be limited to just designated Wild Rivers. There are many, many wild and free and pristine rivers throughout the Refuge. Whether a river is within a Wilderness area, is a designated a Wild River, or not, all are integral to the wilderness, habitat, and biological value of the Refuge, and they all should be managed accordingly.

There should be goals and objectives to ensure that not just rivers, but also lakes and streams, are managed to be maintained undisturbed in their natural, pristine condition. In other words, the ecological functions, character, and values of all water bodies within the Refuge should be protected.

Goal 4 Objectives

The first bullet makes reference to advisory groups. I suggest that any advisory group be diverse, and include some members who are not subsistence users and not necessarily hunters. When establishing management policy, I think it is important to have the benefit of diverse perspectives.

Goal 5 Objectives

The second bullet is to develop a Visitor Use Management Plan. This objective should be deleted and replaced with the following: “Develop a Wilderness Stewardship Plan, a component of which would be a Visitor Use Management Plan;”

This Goal 5 is integral to not only the essence of the visitor experience, but also touches on most aspects of the Refuge management. There are a lot more objectives that should be included under Goal 5. This is an organizational challenge, because many management objectives could be listed under, for example, Goal 1, Goal 2, Goal 5, or all three. For example, the suggestion I have (see above) of adding an objective to monitor and maintain a natural landscape could be under any or all these goals.

Further, to manage visitor use, and preserve the wilderness recreational activity qualities specified in the Goal 5 statement, there has to be compliance checking and monitoring of impacts, as well as a means to identify, assess, prioritize, and determine how best to remediate the impacts. Again, there is a lot of overlap among goals 1, 2, and 5, but my impression is that the objectives for Goal 5 are incomplete.

Goal 8 Objectives

The 6th bullet says “monitor at-risk sites.” I suggest adding the words “identify and” so that the bullet reads: “identify and monitor at-risk sites.”

New Management Guidelines (pages 15 - 17 of Summary of Draft CCP)

In reviewing the Summary, I am doing so because it represents the full CCP. Most of my concerns with the Summary, therefore, extend to the full CCP. It is a little confusing because the Summary is not always consistent with the CCP or it fails to include what I think is important information. I am including my concerns with the Summary (even the few instances where the full CCP clarifies the issue or otherwise satisfies my concern) because when the CCP is adopted, it is the updated Summary that people will be looking at for general reference.

Key change number 1 (page 15)

I suggest inserting the words “population numbers” after the word “diversity” and striking “highest degree of” and adding the clause “provided that chemical treatment may be used only as

a last resort after exhausting all other options.” Number 1 would then read: “Fish and Wildlife Habitat Management: Fish and wildlife habitat would not be actively managed, or altered. Rather, management would seek to sustain the natural diversity, population numbers, and biological integrity. Activities such as crushing, chemical, or mechanical treatments or the constructions of structures should not be allowed unless necessary to address invasive species or management emergencies, provided that chemical treatment may be used only as a last resort after exhausting all other options.” What I am trying to accomplish with this suggestion is strengthen the protective language to better ensure resolute, unwavering protection of all of the Refuge’s wilderness values.

[136816.026 Refuge Management Policies/Guidelines -- Human Safety & Management Emergencies] Change number 1, as do changes 2, 3, and 6, uses the term “management emergencies.” This term is not defined in the Summary CCP, and I think it would be helpful to either define the term or make reference to Chapter 2, page 2-37, section 2.4.2 of the full CCP.

Key change number 2 (page 15)

This is an important guideline, and I am glad to see it, but it appears inconsistent with the management guidance presented in “Summary of Selected Management Provisions” Table. See Activity or Use: “Access on Foot, by Dog Team, or with other Domestic Animals” at the top of page 17. This Activity or Use would be “Allowed” in Wilderness, Wild Rivers, and Minimal Management areas. Domestic animals can transmit disease to wild animals, for example pack goats to Dall sheep. I suggest you Google “disease transmission domestic livestock to wildlife.” There are many hits. I don’t think that domestic livestock should be categorically “Allowed.” At the very least, domestic livestock should be subject to a case-by-case basis permit system, with careful evaluation and test of the livestock before being permitted to enter the Refuge. FWS should take a close look at this to determine the problem areas, and to perhaps have some species of livestock banned outright and some subject to a permit system with careful evaluation and test of each individual domestic livestock animal entering the Refuge.

Key change 4 (page 15)

I am glad to see this ban on public facilities.

Key changes 5 and 6 (page 15)

I support both of these.

General

All-terrain and off road vehicles do tremendous damage to the land, wetlands, and, to water (e.g., through erosion). I am glad to see the ban includes air boats and air cushion vehicles. Not only should this ban continue, but provision should be made for monitoring such use and enforcing the ban. What good is a ban if there is no mechanism in place to ensure compliance? I also think that the language should be broad (to include new future off-road travel machines that cannot be envisioned today), such as “use of any land or water vehicle or conveyance, including but not limited to ATVs, ORVs, air boats, and air cushion vehicles, that adversely impacts the natural resources of the Refuge is prohibited.”

I also support the ban on recreational use of helicopters, whether for access or overflights. Helicopters are exceptionally noisy and intrusive to visitors and wildlife alike, and should be prohibited except for emergencies or by FWS (as rarely as possible) for necessary Refuge management purposes.

Page 16, line item 1 in the table, “Habitat Management – Mechanical Treatment:” There should be some guidance with respect to the qualification “with exceptions.” I would suggest language like “with exceptions, and only as a last resort” or (“only after other options have been thoroughly and meaningfully evaluated”). This should apply to all three categories: Wilderness, Wild Rivers, and Minimal Management. In addition, when exceptions to “not allowed” are contemplated, Minimum Requirements Analysis (MRA) should be required in the Wild River and Minimal Management categories as well as the Wilderness category.

Page 16, line item 2 in the table, “Habitat Management – Chemical and Manual Treatment.” Similar to line item 1 above. Although the boxes in this table are no doubt expanded upon and explained in the CCP, I think that the table is somewhat misleading because it lacks clear and strong language in instances where an Activity or Use is allowed under exception circumstances (e.g., “may be allowed”). I think that “not allowed, with exceptions” is better than “may be allowed” and even better is “not allowed, except in emergencies and only as a last resort.” This should apply to all three categories (Wilderness, Wild Rivers, and Minimal Management).

Page 16, line item 3 in the table, “Fire Management – Prescribed Fires and Wildland Fire Use,” which is shown as “allowed.” This is inconsistent with the full CCP, which states [see page 2-77 of the CCP (Table 2.1)] that Fire Management – Prescribed Fires and for Fire Management – Wildland Fire Use are both “may be allowed” for all Wilderness, Wild River, and Minimal Management. The Summary CCP Draft is not consistent with the full CCP draft. I think that the full CCP draft is correct and that this is probably a transcription error going from the full CCP to the Summary. In any event, there should not be a blanket “allowed.” There should be language that compels a thoughtful and meaningful analysis and evaluation of all alternatives before this is allowed... and this should apply to all three categories. If these activities are to be allowed in special or emergency circumstances, then there should be strong guiding language accordingly.

Page 16, line item 4 in the table, “Fish and Wildlife Control.” My concern here is similar to above, but more urgent. The vague language in the table (i.e., “may be allowed”) is misleading because it fails to emphasize the fact that, according to the full CCP draft, Fish and Wildlife Control would be used only in emergencies (see 2.4.12.7 of the CCP, page 2-55). Section 2.4.12.7 references section 2.4.2 for a definition of Human Safety and Management Emergencies. The language of this line item 2, Fish and Wildlife Control (page 16 of the Summary) should, for all three categories, be “NOT ALLOWED, except in emergencies.”

In general, all of the Activities or Uses that “may be allowed” or are “not allowed, with exceptions” ought to have stronger, specific language attached. I think for most of these in the table, “not allowed, except in emergencies” would cover it.

Page 17 (of the Summary), second line item “Motorized/Traditional Access: Use of snowmobiles, motorboats, airplanes, and non-motorized surface transportation methods including non-motorized boats for traditional activities and for travel to and from villages and home sites.” The lack of commas after “methods” and after “non-motorized boats” means that “traditional activities” modifies only non-motorized boats. I believe that the intent of the sentence is for traditional activities to apply to “snowmobiles, motorboats, airplanes, and non-motorized surface transportation methods” as well. This is confirmed by reference to section 2.4.14.1 of the CCP, page 2-59, which I believe is correct. Therefore, the sentence (page 17 of the Summary) should be: “Use of snowmobiles, motorboats, airplanes, and non-motorized surface transportation methods, including non-motorized boats, for traditional activities and for travel to and from villages and home sites.” This is the same as line item 2 on page 17 of the Summary of Draft CCP except for

the insertion of the two commas. In addition, “traditional access” should be defined so that recreational snowmachine use can be prohibited.

Chapter 2.4 of the CCP

There are a few points within Chapter 2, section 4 that I would like to highlight because I strongly support them:

2.4.11.1 Habitat Management: I hope that this section is a very high management priority, especially the sentences: “The intent of management will be to leave habitats unaltered and unmanipulated. Natural habitats will not be modified or improved to favor one species over another.” In addition, I like the second sentence (of this section of the CCP), but as noted above, would suggest modifying it as I have indicated above in Key change number 1, under New Management Guidelines.

2.4.12.7 Fish and Wildlife Control: I also hope that this section is a very high management priority, especially the sentences: “On Arctic Refuge, all native species are integral and interdependent members of a natural community of life. Management will strive to enable the natural behavior, interactions, and population dynamics of all species to continue.”

Thank you for this opportunity to comment.

Sincerely,

[signed]

John Strassenburgh

- Comment CCP draft plan and EIS 111411.doc

COMMUNICATION NUMBER 32626

Greg Warren

From: "gnwarren"

To:

Subject: Comments on the Draft CCP/DEIS - Microsoft Word Format

I just sent comments to the ArcticRefugeCCP@fws.gov email address in a PDF format. This mailing includes the same comments, but in Microsoft Word just in case it is an easier format for your response purposes. I ended up spending about a week reading the draft material, researching issues using the web, and then commenting. Unfortunately, such a rapid assessment didn't allow for a lot of time to wordsmith, so please contact me if any of the comments need clarification. Thank you for taking on this revision task, I know that it is a challenging job. Greg - arctic_draft_ccp_comments_final_gwarren.docx

Attachment:

Arctic National Wildlife Refuge
U.S. Fish and Wildlife Service
Attention: Arctic NWR - Sharon Seim,
101 12th Ave., Rm. 236
Fairbanks, AK 99701
Email: ArcticRefugeCCP@fws.gov

I am commenting on the Arctic National Wildlife Refuge draft Comprehensive Conservation Plan (CCP) and DEIS. I support the Arctic Refuge vision statement and goals that aspire to protect the natural behavior of wildlife populations, while leaving habitats natural and un-manipulated. Overall, the entire 19-million acres that make up our nation's largest, wildest refuge should be managed in a manner that leaves its natural biodiversity, ecological processes, Wild River outstanding remarkable values, and Wilderness character intact so that the Arctic Refuge will remain a matchless part of our natural heritage and landscape.

Following are summary comments on the Arctic Refuge CCP and DEIS:

- Alternatives: I support Alternative E with modifications as described in the Appendix. Most important is to preserve the coastal plain through Wilderness and Wild River designations in recognition of the extraordinary natural ecosystem.
- Goals: **[32626.001 Refuge Vision and Goals -- General]** I support the CCP's proposed goals and objectives, especially goals 1, 2, and 5, specifying protection of ecological processes and Wilderness character. I recommend adding an objective of preparing Population Management Plans for key species.
- Management Guidelines: I support management guidelines 2.4.6, 2.4.11, and 2.4.12 allowing the natural behavior, interactions, and population dynamics of all species to continue, and leaving habitats natural, unaltered, and un-manipulated.
- Special Values: I support the CCP's Special Values of the Arctic Refuge.
- **[32626.002 Recreation and Visitor Use -- Special Use Permitting]** Visitor Use Management: I recommend that a moratorium be placed on issuing permits that would

increase the number of visitor use days until such time that a step-down Visitor Use Management Plan direction can be applied.

- **[32626.003 Refuge Management Policies/Guidelines -- Fish and Wildlife Population Management]** Wildlife Population Management: I believe that the relinquishment by the Refuge of management responsibilities for fished and hunted species to the State of Alaska is likely materially interfering with and detracting from the fulfillment of the purposes for which the Refuge was established. The CCP should prescribe that when State population management actions materially conflict with Refuge purposes that the Refuge will preempt Department of Fish and Game and Board of Game regulations. To implement this direction, the CCP needs to establish that compatibility determinations are to be completed to address the potential population effects on various species of Alaska fishing and hunting regulations (603 FW 1.10-B).
- Wilderness: I support recommending Wilderness designation for the Coastal Plain, Brooks Range, and Porcupine Plateau Wilderness Study Areas. Most important is a Wilderness recommendation for the Coastal Plain Wilderness Study Area due to the area's unmatched ecological significance.
- **[32626.004 Wild and Scenic Rivers -- Eligibility (includes Appendix D)]** Wild and Scenic Rivers: I recommend that the 28 rivers and creeks that are listed in Table 1 of the following Appendix be determined Eligible rivers in the CCP. These rivers are free-flowing and possess at least one outstanding remarkable value. Suitability determinations should be addressed outside of this planning process. If the Refuge proceeds with Suitability, I would appreciate your consideration of a proposed Wild Rivers complex, as depicted in Figure 1 of the Appendix, identifying those rivers as Suitable for designation.

The Arctic National Wildlife Range was set aside 50 years ago for its “unique wildlife, wilderness, and recreational values,” and now the Arctic National Wildlife Refuge continues to be one of our nation’s most pristine wild areas. I urge you to adopt Alternative E with modifications establishing a Comprehensive Conservation Management Plan that will provide for the purposes for which the Arctic Refuge was established and to recommend designation of Wilderness for the entire Refuge.

The Appendix that follows provides specific comments and recommendations to improve the management direction in the final CCP.

Thank you for considering these comments. Please contact me if you have any questions.

Greg Warren
22 S. Juniper Ct.
Golden, CO 80401-5002

Appendix – Detailed Comments on Draft CCP and DEIS

Appendix – Arctic CCP and DEIS Detailed Comments

[32626.005 Purpose and Need --] V1, 1-2, 1.1 Purpose and Need for Action: The purpose should describe the desired outcomes of having a CCP. I recommend supplementing the discussion to describe that the desired outcome of the planning process is to ensure that the Refuge is managed to achieve the purposes for which the Arctic Refuge, Wilderness, and Wild Rivers were established, and to identify potential additions to the Wilderness Preservation System and Wild and Scenic Rivers System (602 FW 1.5).

[32626.006 NEPA Process -- DEIS Hearings and Comment Analysis] V1, 1-29, 1.8.5 Prepare Draft Plan and Environmental Impact Statement: I was disappointed that the public meetings for the draft CCP and DEIS were held only in Alaska. I believe that two or three meetings in the lower 48 states were needed in order to “make diligent efforts to involve the public in preparing and implementing...NEPA procedures” (40 CFR 1506.6(a)).

[32626.007 Consultation and Coordination -- State Coordination] V1, 1-10, 3.3 Coordination with the State of Alaska: The discussion on coordination needs to be supplemented to clarify the responsibilities of the Service and to discuss compatibility determination requirements (603 FW 1.10-B). Supplement the discussion by adding, “Alaska Department of Fish and Game (ADFG) regulations would not apply if found to be incompatible with documented refuge goals, objectives, or management plans.”

[32626.008 Refuge Purposes -- General] V1, 1-18, 1.4.2.1 Arctic Refuge’s Purposes: The affected environment and environmental consequences chapters should clearly discuss the legislative purposes of the Refuge. Relating issues, alternatives, affected environment, and environmental consequences to the Arctic Refuge purposes is critical for making informed decisions on the direction to adopt in the CCP.

[32626.009, Preamble 010] V1, 1-23, 1.6.2 Refuge Goal 1: The wording of this goal as stated is confusing. Instead, the goal could state, “Natural ecological processes will determine the fish, wildlife, and plant population densities and dynamics in the Refuge.”

[32626.010 Refuge Vision and Goals -- Goal 1 (including objectives)] V1, 2-1, 2.1.1 Refuge Goal 1: See V1, 1-23, 1.6.2—above.

[32626.011 Refuge Vision and Goals -- Goal 1 (including objectives)] V1, 2-1, 2.1.1 Refuge Goals and Objectives, 1.1: The word “actions” would help relate the direction to projects that will be implemented. I recommend adding, “actions and” to objective 1.1. This should read, “All management actions and programs....”

[32626.012 Refuge Vision and Goals -- Goal 1 (including objectives)] V1, 2-4, 1.7 Goal 1, Page 2-4, Objective 1.7: The objective statement should be supplemented to describe that compatibility determinations would be completed for the primary hunted species in the Refuge. This would help assure that the ADFG management programs, as implemented on the Refuge through hunting regulations, are consistent with the Refuge goals and objectives.

[32626.013 Refuge Vision and Goals -- Goal 2 (including objectives)] V1, 2-9, 2.4 Goal 2, Strategy: Other Wilderness management strategies should be identified to control impacts where necessary. Address the possibility of limiting the number and location of aircraft landings and related impacts.

[32626.014 Refuge Vision and Goals -- Goal 3 (including objectives)] V1, 2-10, 3.1 Goal 3, Strategy: Scoping for CRMPs was initiated in 1993, so the CRMPs need to proceed quickly due to failure to act considerations (5 USC 706(1)).

[32626.015 Refuge Vision and Goals -- Goal 5 (including objectives)] V1, 2-19, 5.9 Goal 5, Strategy: The inventory of commonly used landing areas is critical and should be a priority for applying Refuge resources. Other strategies that should be listed include limiting aircraft to discrete landing zones, and if necessary, seasonally limiting the number of aircraft that can land in each zone through permitting practices. (To be clear, the Refuge must not have any FAA certified runways.)

[32626.016 Refuge Management Policies/Guidelines -- General] V1, 2-37, 2.4 Management Policies and Guidelines: In general, the programmatic direction in the CCP for proposed and exiting

Wilderness and Wild and Scenic Rivers should reflect the level of detail that is found in the Interim Management Prescriptions for potential Wild and Scenic Rivers (SUIT-D1). The step-down management plans would then tier to the CCP direction and FEIS. Guidance for the designated Wild and Scenic Rivers is absent in this section and needs to be included in the final CCP.

[32626.017 Land Status -- Navigable waters] V1, 2-37, 2.4.3 Land Exchanges and Acquisitions: Ownership of riverbeds in the areas added to the Arctic National Wildlife Range has not been adjudicated. I recommend that the CCP set the stage for a collaborative approach of working with the State and all Federal agencies in Alaska to obtain ownership of any State owned navigable riverbeds of the potential Wild and Scenic Rivers.

V1, 2-40, 2.4.5 Appropriate Refuge Uses: The intensity and extent of the use is not addressed as a factor. The list of appropriate Refuge uses should include a statement that the use intensity and extent must be consistent with the Arctic Refuge's purposes (603 FW2).

V1, 2-41, 2.4.6 Compatibility Determinations: The CCP does not include an adequate compatibility determination that addresses the application of the ADFG fishing and hunting regulations in the Refuge (603 FW 1.10-B). Determinations should address the following questions: Are the ADFG goals and objectives for fish and wildlife management consistent with principles of sound fish and wildlife and administration, available science and resources, and the Arctic Refuge purposes? Is there the potential that allowed bag limits are materially interfering with or detracting from the fulfillment of the purposes of the Refuge? The direction should also describe that compatibility determinations for ADFG hunting, fishing, and trapping regulations is approached on a species-by-species basis in order to assure that Refuge fish and wildlife population objectives are achieved.

[32626.018 Refuge Management Policies/Guidelines -- Cooperation and Coordination with Others] V1, 2-44, 2.4.9.1 Cooperation and Coordination with Others (Paragraph 2): Due to different goals, the Service and ADFG may be unable agree on fish and wildlife harvest levels in the Refuge. It is my sense that actions taken in by ADFG to establish liberal seasons and bag limits may be in direct conflict with the Refuge's Federal mandates. Thus, compatibility determinations of ADFG species harvest regulations are critical to protecting Refuge values.

A commenter on the scoping notice expressed related concerns, which is used as an example in the summary of public comments on page 18 and coded as 645.20. I also expressed similar concerns: "Any existing Memorandum of Understanding with the State of Alaska is not an authority that can constrain CCP considerations and decisions. Related, Q6 should be restated to clarify the State of Alaska provide regulations for fish and wildlife, while the USFWS assures that such regulations are consistent with the CCP and other Federal considerations. For example, to meet Arctic Refuge goals, I believe that fish and wildlife populations should be managed so that hunting does not materially change the natural age structures of wildlife populations in each of the principle hunting areas (e.g., Dall sheep, upper Hulahula River)."

The incomplete Master Memorandum of Understanding (MMOU) quote in this part does not adequately characterize the direction in the agreement. It is important to supplement this section by adding the following language: "Compatibility determinations are the appropriate approach for a first screen to address whether season length and bag limit regulations are compatible with the Arctic Refuge purposes."

The Master Memorandum of Understanding (MMOU) quote in this part needs to be supplemented by adding the following verbiage from the MMOU: "To recognize that the taking of fish and wildlife by hunting, trapping, or fishing on Service lands in Alaska is authorized in

accordance with applicable State and Federal law unless State regulations are found to be incompatible with documented refuge goals, objectives, or management plans.”

[32626.019 Visual Resources -- General] V1, 2-49, 2.4.10.4 Visual Resource Management: I recommend that the Refuge use either the BLM or Forest Service visual resource management approach to provide scenery management direction and disclose effects. Otherwise, scenery assessments and direction could be seen as subjective and the methodology may not be repeatable.

[32626.020, Preamble 021] V1, 2-52-2.4.12 Fish and Wildlife Population Management: The first sentence states, “The State of Alaska and Service each have directives affecting fish, wildlife, and land management, and will work cooperatively to fulfill these responsibilities.” This statement is misleading. The State and Service have conflicting laws governing the management of fish and wildlife. There is no indication from past Refuge practices that the Service will preempt the State if necessary to achieve Refuge purposes. I recommend deleting the first sentence or describe how ADFG has a different mandate for managing wildlife than those prescribed for the Refuge.

[32626.021 Refuge Management Policies/Guidelines -- Fish and Wildlife Population Management] I believe that the CCP needs to establish programmatic population goals and objectives, and commit to developing Population Management Plans for many of hunted, fished, and trapped species (701 FW 1, General). These step-down management plans need to be discussed in this section.

[32626.022, Preamble 023] V1, 3-1, 3 Proposed Action: I could not identify the Proposed Action (40 CFR 1502.14). **[32626.023 Refuge Management Policies/Guidelines -- Compatibility Determinations (includes Appendix G)]** I was expecting the compatibility determinations would utilize the Proposed Action as opposed to the no action alternative (i.e., the 1988 CCP) as the basis of the assessments in Appendix G. The CCP needs to clarify the basis of the compatibility determines explaining the rationale if the outdated 1988 direction is used.

[32626.024 Refuge Management Policies/Guidelines -- Fish and Wildlife Population Management] V1, 3-1, 3.1 Issues: The potential effects of ADFG hunting regulations on wildlife populations is a significant issue that needs to be addressed in the CCP and NEPA document. This issue was identified during scoping and is within the scope of the analysis due to direct, indirect, and cumulative impacts of the implementation of the harvest regulations on the Refuge. The current harvest seasons and bag limits on wolves is confirmation that State actions may be materially interfering with or detracting from the fulfillment of the purposes of the Refuge. The revised CCP needs to address adequate processes and resources needed to assess and manage fish and wildlife populations in the Refuge, while collaborating to extent practicable with ADFG.

[32626.025 Refuge Management Policies/Guidelines -- Fish and Wildlife Population Management] V1, 3-6, 3.1.2 Issues Considered but Eliminated from Detailed Study: I am concerned that the ADFG regulations effects on Refuge purposes will not be addressed in the final CCP and EIS, since the issue was avoided in the draft CCP and DEIS. If the EIS does not address the hunting effects resulting from the ADFG regulations as a significant issue, the EIS must describe in this part why wildlife population effects resulting from ADFG regulations will not have a significant effect on the Refuge purposes.

[32626.026 Wild and Scenic Rivers -- Eligibility (includes Appendix I)] V1, 3-3, 3.1.1.2 Wild and Scenic Rivers: Important rivers were screened as not being Eligible for Wild and Scenic Rivers designation. However, many of these rivers are free-flowing and possess at least one outstanding remarkable value (ORV). I recommend that the rivers listed in Table 1 of this Appendix be

determined Eligible rivers in the CCP. The final CCP should describe the remaining rivers and creeks as not being fully evaluated for Eligibility as part of the CCP revision process.

[32626.027 Wild and Scenic Rivers -- Suitability (includes Appendix I)] V1, 3-7, 3.1.3.2, Wild River Actions not in the Alternatives: Due to process issues, I believe that only Eligible rivers should be identified in the final CCP. Suitability determinations should be addressed through another planning process. If the Refuge proceeds with Suitability, I would appreciate consideration of a proposed Wild Rivers complex as depicted in Figure 1 of this Appendix identifying those rivers as Suitable for designation.

[32626.028 Alternatives Analyzed -- Evaluation of Alternatives] V1, 3-10, 3.2 Alternatives: To clarify roles and responsibilities, I recommend that the discussion be supplemented with the following: “ADFG will continue to establish hunting regulations in the Refuge. Initial compatibility determinations of the ADGF hunting regulations effects on key wildlife species will be completed within two years. These determinations will be updated when population trends change or regulations for harvest levels (bag limits) and hunting seasons are modified by Alaska Board of Game/ADFG or every five years, whichever period is sooner.”

[32626.029 Alternatives Analyzed -- Table 3-2 (Comparison of Alternatives)] V1, 3-38 Comparison of the Alternatives, Table 3-2: Differences between population management programs are not addressed for each alternative. Wildlife population management actions by the Refuge and ADFG should be included in the summary table.

[32626.030 Alternatives Analyzed -- Evaluation of Alternatives] V1, 3-53, 3.4.3 Response to National Wildlife Refuge System Mission: It is possible that the relinquishment of Refuge population management responsibilities to the State is resulting in the Refuge System being degraded. Alternatives need to address State fish and wildlife hunting regulations concerns.

[32626.031 Mammals -- Species of Concern] V1, 4-88 to 4-119, 4.3.7.3 Species of Special Interest and Concern: I recommend that the details of this section be retained or expanded in the EIS. The information provided in this section is important for understanding the consequences of the no action and action alternatives.

[32626.032 Subsistence -- Subsistence Management] V1, 4-119, 4.3.7.4 Mammal-Related Management Issues: This section reads as if the Arctic Refuge was established for the purposes of increasing the abundance of certain game populations for human consumption. This discussion reinforces my belief that wildlife population management is an issue that needs to be addressed in the revised CCP. Establish in the CCP the direction to develop Population Management Plans for all of the principal hunted species.

[32626.033 Recreation and Visitor Use -- Visitor Experience] V1, 4-208, 4.4.5.2 Visitor Use and Recreation, Early Records of Visitor Use, Paragraph 3: The 1977 activities, attitude, and management preference study identified visitor use issues that persist today. Hence, it would be appropriate to describe that visitors in 1977 indicated preferences for the level of encounters with other recreationists and sighting of low flying aircraft, while including management recommendations. Include the following summary of the study in this section: “A descriptive study of activities, attitudes, and management preferences of recreationists was conducted on the Arctic National Wildlife Range. The majority of the sampled Arctic Range recreationists in 1977 were male, between 25 and 44 years old, and college educated. Recreationists were generally very satisfied with their trip. Satisfaction for hunters was associated with hunting success. Developments were generally opposed; general information was desired; and limiting plane landings was the most preferred of three proposed rationing systems. The limiting social factor for hunters was sightings

of groups, and the limiting social factor for recreationists not hunting was light-aircraft sightings.” (Warren, G.A. 1980. Activities, attitudes and management preferences of visitors of the Arctic National Wildlife Range, Alaska. M.S. Thesis. Univ. of Idaho. 51 pp.)

[32626.034 Wildlife -- State Harvest Records] V1, 4-216, 4.4.5.7 State Harvest Records for General Hunting and Trapping: The affected environment section should provide a summary of the harvest levels for each Game Management Unit (or Guide Use Area if data is available at that scale). Provide a summary of the estimated known population and trend for the principle hunted species: Dall sheep, moose, grizzly bear, caribou, black bear, and wolf. Lake trout in Neruokpuk Lakes should also be included. These tables could then be reproduced in the environmental consequences chapter to disclose the predicted effects of each alternative on these species. The no action alternative should describe the current population management programs and the effects of those programs.

[32626.035 Wildlife -- State Harvest Records] V1, 4-221, 4.4.5.7 State Harvest Records for General Hunting and Trapping, Harvest Information: Graphs for grizzly bears, wolves, and wolverine harvests are not included, but that information should be displayed. This is important since these species are listed in the enabling legislation. This data would also be helpful for disclosing impacts in the environmental consequences chapter.

[32626.036, Preamble 037] V1, 4-226, 4. Perceived Crowding, Conflicts, and Resource Impacts: The first two paragraphs of this section should be moved to Environmental Consequences. The third paragraph should be described as an issue to be addressed in step-down management plans. **[32626.037 Recreation and Visitor Use -- Special Use Permitting]** Describing that management actions will be reactive to address impacts after the damage occurs is not sound resource management, especially in tundra environments. In addition, visitor use levels and patterns are difficult to reverse once air taxi, transport, and outfitter services are established. I recommend that the Arctic Refuge establish a moratorium on issuing any special use permit that would increase visitor use levels until visitor use step-down plans direction can be applied—limit permits and associated visitor days to 25 recreation special use permits and 14 air operations permits (Table 4-18).

[32626.038 Environmental Consequences -- Effects Common to Alternatives] V1, 5-1, 5.1 Environmental Consequences: The section fails to address the likelihood of conflicts between the CCP alternatives and the objectives of state land use plans (e.g., ADFG Hunting Regulations). In addition, **[32626.039 Alternatives Analyzed -- Evaluation of Alternatives]** the DEIS does not discuss the scientific and analytic basis for the comparison of the proposed action and alternatives. A Supplemental or Final EIS needs to correlate the discussion of effects to the affected environment chapter.

[32626.040, Preamble 041, 042] V1, 5-3, 5.1.3 Impact Topics: The general discussions that are presented around resource categories are valuable, but are too general to describe adequately the effects of the alternatives. I believe that the effects need to be quantified using the best available data. This would include describing the effects of the no action, proposed action, and alternatives on the principle wildlife species: Dall sheep, moose, grizzly bear, caribou, black bear, and wolves. For illustrative purposes, I will use an example of what should be covered in the environmental consequences chapter. Wolves and wolverines are addressed in the affected environment section on page 4-114. This section describes that north of the Brooks Range there are between 20 and 40 wolves present between Canning River and the Canada border. Furthermore, the section describes that little is known about population trends or abundance of wolverines in Arctic Refuge. Currently, ADFG 2011-2012 hunting regulations for 26C established a ten wolf and one

wolverine bag limit for the area for both residents and nonresidents. For the purpose of this example, assume there are 100 recreational hunters that have the opportunity to harvest 10 wolves each or 1,000 wolves—the 100 estimate of hunters was derived from 1977 recreational hunting data. Related, in just one of the several big game guide commercial service areas, the Refuge is currently inviting proposals that describe the authorized number of clients for wolf hunting as six. The Federal subsistence harvest limits are 15 wolves and five wolverine. Extrapolating from the above information, what are the potential direct, indirect, and cumulative effects of hunting on the 20 to 40 wolves and the unknown number of wolverine that inhabit this part of the Refuge? Relying on past harvest data is very limiting, but that may be the best available information. With limited population data, it is critical that the Refuge CCP establish direction and processes to assure that ADFG goals and regulations do not circumvent the goals and objectives of the Refuge. **[32626.041 Environmental Consequences -- Impact Topics]** It is also important to address in this section these questions: Are the ADFG regulations and the Refuge permitting processes consistent with principles of sound fish and wildlife and administration, available science and resources, and consistent with Arctic Refuge purposes? Is hunting as allowed by ADFG regulations and implemented through existing Refuge programs materially interfering with or detracting from the fulfillment of the purposes of the Refuge? In addition, **[32626.042 Step-Down Plans -- General]** step-down Population Management Plans need to be developed over the next few years that are specific to key species and discrete areas, possibly developing direction for each of the exclusive guide areas (701 FW 1, General). Also see comments on Future Step-Down Plans (V1, 6-3, 6.3) that follow.

[32626.043 Environmental Consequences -- Effects Common to Alternatives] V1, 5-4, 5.2.1 Effects Common to Alternatives: Hunting as allowed by ADFG regulations is likely to be materially interfering with or detracting from the fulfillment of the purposes of the Refuge for all alternatives, including no action. The environmental consequences chapter needs to address the potential effects of the ADFG regulations and special use permitted activities on the hunted species and ecosystem. These effects may be common to all alternatives. What are the potential direct, indirect, and cumulative effects of the bag limits on the hunted species, other wildlife, and wildlife related visitor use purposes of the Refuge? If the Refuge determines the ADFG's hunting regulations to be in conflict with the Refuge's purposes than State regulations must be preempted. A determination of a substantial effect would allow for a broader range of NEPA alternatives or mitigation that would be addressed in a Supplemental EIS or FEIS. A new alternative would need to be designed to mitigate the potential impacts to an acceptable level. For a programmatic plan such as the CCP, the alternative or mitigation could be increased regulatory mechanisms to assure that the Refuge purposes are realized.

[32626.044 Wild and Scenic Rivers -- Suitability (includes Appendix I)] V1, 5-8, 5.2.3 Rivers Reviewed for Wild and Scenic Potential: The Wild and Scenic Rivers review process undertaken as part of the CCP is flawed. Therefore, I would advise not completing Suitability determinations as part of this planning process. Instead of determining Suitability, I recommend that the rivers listed in Table 1 of this Appendix be determined Eligible rivers in the CCP. They are all free-flowing have one or more ORV. The final CCP should describe the other rivers and creeks as not being fully evaluated for Eligibility as part of CCP revision process. If Suitability recommendations are postponed for another planning process, than all of the rivers in Table 1 should retain their Eligibility status and be protected with management prescriptions.

[32626.045 Environmental Consequences -- Effects Common to Alternatives] V1, 5-9, 5.2.4.1 Common Effects of the Alternatives on Resources, Glaciers: Management of areas designated as

both Wilderness and Wild Rivers would receive protection under both authorities, so the statement in the DEIS needs to be corrected (16 U.S.C. 1281(b)).

[32626.046, Preamble 047] V1, 5-11, 5.2.4.1 Common Effects of the Alternatives on Resource Categories, Mammal Populations and Natural Diversity: The one sentence effects description that states, “Dall’s sheep seem to be capable of sustaining harvest levels” does not adequately address Refuge purposes as identified in ANILCA, nor does the “disclosure” meet NEPA requirements. Do all of the alternatives demonstrate that the Refuge is conserving mammal populations (e.g., grizzly bears, Dall’s sheep, wolves, and wolverines) and habitats in their natural diversity?* Does the analysis insure the professional integrity, including scientific integrity, of the discussions and analyses in EIS (40 CFR 1502.24)? What are the direct, indirect, and cumulative effects of hunting on mammal populations (40 CFR 1502.16)?

I believe that Wilderness and Wild River designations would provide a greater level of protection for mammal populations and natural diversity. Maintaining Wilderness character and wildlife ORVs would help protect the natural diversity of wildlife populations.

[32626.047 Mammals -- Effects of Alternatives] The environmental consequence disclosure discussions are insufficient and need to be more robust in the FEIS and correlated with the affected environment discussion found in the Species of Special Interest and Concern section, pages 4-88 thru 4-119.

[32626.048 Glossary (Appendix M) --] The glossary definition of natural diversity is incorrect. Directory 701 FW 1 defines natural diversity as, “the number and relative abundance of indigenous species that would occur without human interference.”

[32626.049 Irreversible and Irretrievable Commitments --] V1, 5-99, 5.12 Irreversible and Irretrievable Commitment of Resources: The idea that loss of wildlife and habitat and visitor uses opportunities can be retrieved over time is false. If there were a major energy related development in the Arctic, impacts to the wildness of the Refuge would be irreversible and irretrievable.

[32626.050 Step-Down Plans -- Inventory & Monitoring Plan] V1, 6-3, 6.3 Future Step-Down Plans: This section does not contain direction to develop Population Management Plans for Dall’s sheep, moose, grizzly bear, caribou, black bear, and wolf (701 FW 1, General). Direction to develop such plans needs to be added to this section of the final CCP. I believe that these plans should be a priority 1 and integrated with the Ecological Inventory and Monitoring Plan. The 701 FW 1 Policy does not provide specific guidance for developing Population Management Plans; however, there is ample guidance for using a Limits of Acceptable Change (LAC) type process for addressing the contrasting Federal (P.L. 96-487 and P.L. 88-577) and State (AS 16.05.255) mandates for managing fish and wildlife in the Refuge (Forest Service General Technical Report INT-GTR-371). LAC’s primary usefulness is in situations like this where management goals are in conflict, where it is possible to compromise all goals somewhat, and where planners are willing to establish a hierarchy among goals. In addition, it would be necessary to write standards for the most important (constraining) goals—standards that are measurable, attainable, and useful for judging the acceptability of future conditions. Using Dall’s sheep as an example, the goal would be to establish direction that would satisfy both the State’s goal to, “manage for maximum sustainable harvest of Dall’s sheep rams with full-curl or larger horns” and the Refuge’s goals, especially 1, 2, 4, and 5. The LAC approach is better than the current situation of the relinquishment of the Service’s ANILCA and Wilderness population management (protection) responsibilities to a State that has conflicting interests.

[32626.051 Step-Down Plans -- General] It is unclear why implementation plans would take a decade or more to complete. There is no obvious reason why a Visitor Use Management Plan couldn't be completed in a three-year period being initiated in 2012. What would be interim direction during this wait period? Will there be a moratorium on allowing an increase in visitor use while the plan is being prepared? If not, the CCP needs to describe why it would be OK to allow impacts to continue or increase during the planning horizon of the step-down plans.

[32626.052 Implementation and Monitoring --] V1, 6-9, 6.6 Monitoring and Evaluation: The draft CCP does not describe monitoring Dall's sheep, moose, grizzly bear, caribou, black bear, and wolf populations. It is important to monitor the health of these populations, especially in light of the ADGF current hunting regulations. Shouldn't populations be closely monitored for the species that are listed in ANILCA for why the area was established (Section 303(B))?

[32626.053 Legal and Policy Context (Appendix A) -- Policy Guidance] V2, A-10, A-2.4 Compatibility 603 FW: I recommend supplementing this discussion to clarify the relationship between a compatibility determination and NEPA describing that: "A compatibility determination is not an action under NEPA. Deciding to allow a specific use is the action, which would require NEPA compliance." Consider providing an example of when NEPA would apply such as the issuance of a Commercial Big Game Guide Services permit.

[32626.054 Consultation and Coordination -- State Coordination] V2, B-1, B.1.1 Alaska Department of Fish and Game: The discussion on coordination needs to be supplemented to clarify the responsibilities of the Service and requirements for compatibility determinations. As stated in the MMOU, ADFG regulations would not apply if found to be incompatible with documented refuge goals, objectives, or management plans. The Service should consider that the basis for the MMOU in 1982 were the Federal and State laws in effect at that time. The MMOU should have been formally revisited after the Alaska State Legislature amended a statute in 1994 to direct the State Board of Game to implement an intensive management program. I recommend that the MMOU be amended for all of the Alaska Region to address the changed conditions. The Refuge should implement processes, such as compatibility determinations, to assure that the State's fish and wildlife management mandates are not being applied to the population management programs in the Arctic Refuge.

[32626.055 Refuge Management Policies/Guidelines -- Compatibility Determinations (includes Appendix G)] V2, G-1 Alaska Department of Fish and Game Regulations: The CCP must include an adequate compatibility determination that addresses the application of the State's management programs as applied through State regulations (or predator control) on the Refuge area. Policy 603 FW 1.10-B states, "when compatible, the take of fish and wildlife under State regulations is a refuge use;" this clearly indicates that a compatibility determination is required. The determination should address these questions: Are the ADFG goals and objectives for fish and wildlife management consistent with principles of sound fish and wildlife and administration, available science and resources, and the Arctic Refuge purposes? Is there the potential that allowed bag limits are materially interfering with or detracting from the fulfillment of the purposes of the Refuge? Does the Refuge have adequate regulatory mechanisms in place to insure that the Refuge's fish and wildlife management objectives are not circumvented by ADFG harvest regulations?

[32626.056 Refuge Management Policies/Guidelines -- Compatibility Determinations (includes Appendix G)] V2, G-1 General, Appendix G: The compatibility determinations need to be regrouped to reflect Refuge use. I recommend combining all recreational use, including hunting and fishing and wildlife observation, into one compatibility determination titled, "Visitor Use." I also recommend combining fishing, hunting, and trapping into another compatibility

determination titled, “Fish and Wildlife Harvest Programs.” The rationale is that 97 percent of the recreational use 1977 was wildlife dependent—see M.S Thesis referenced previously. I am not aware of any new data that would indicate a change in activities. The visitor use assessment would focus on recreational use, vegetation, and water issues. The fish and wildlife harvest assessment would focus on the biological effects of the wildlife management activities that are implemented through State regulations as related to the Refuge purposes. **[32626.057 Refuge Management Policies/Guidelines -- Compatibility Determinations (includes Appendix G)]** All compatibility determinations need to reference and utilize the draft 2011 CCP and DEIS Proposed Action and not the 1988 CCP (no action alternative).

[Preamble 32626.058, 059, 060] I recommend that the following stipulations be added to the Refuge determinations, as appropriate:

[32626.058 Refuge Management Policies/Guidelines -- Compatibility Determinations (includes Appendix G)] * Food and gear caches are not allowed in Wilderness,

[32626.059 Refuge Management Policies/Guidelines -- Compatibility Determinations (includes Appendix G)] * Aircraft must have 12 inch identifications numbers in contrasting colors which are readily visible while flying and on the ground, and

[32626.060 Refuge Management Policies/Guidelines -- Compatibility Determinations (includes Appendix G)] Determinations should specify that they would be re-evaluated as part of Wilderness, Wild and Scenic Rivers, Wildlife Population, and Visitor Use Management Plans.

[32626.061 Refuge Management Policies/Guidelines -- Compatibility Determinations (includes Appendix G)] V2, G-5 State of Alaska Management Activities, Description of Use: To be clear, state that this compatibility determination does not address ADFG fish and wildlife regulations and the associated fish and wildlife harvests on the Refuge. Describe that the State wildlife management activities on the Refuge pursuant to a cooperative agreement between the State and the Fish and Wildlife Service does not include fishing and hunting “population management” programs being implemented through ADFG fishing and hunting regulations (603 FW 2.10-A).

[32626.062 Refuge Management Policies/Guidelines -- Compatibility Determinations (includes Appendix G)] V2, G-80 thru 85 General Hunting: The section “Anticipated Impacts of Uses” does not adequately address impacts to wildlife populations. The narrative states, “the Refuge is directly involved in review and implementation of regulatory process and administrative oversight of general hunting. Because of combined regulatory and law enforcement efforts of the State and Refuge personnel, direct impact from general hunting under existing management should have minimal impacts to fish and wildlife resources, other Refuge resources, or other Refuge users.” The description of “minimal impacts” is not supported by the analysis in the draft documents of the hunting effects on fish and wildlife populations. To the contrary, the draft CCP and DEIS identify existing programs that would have a high potential of impacts to some populations (e.g., wolf). The Mammal-Related Management Issue section (4-119, 4.3.7.4) reads as if the Arctic Refuge was established for the purposes of increasing the abundance of certain game populations for human consumption. The lack of Refuge biologists is also a major concern. The justification now states, “To ensure sustainability of harvest of local residents, the State Board of Game and the Federal Subsistence Board regularly adopt regulations in response to wildlife population levels and management needs. These regulations provide adequate protection for the Refuge’s wildlife resources and continued hunting opportunities, in balance with other Refuge purposes....” Instead, the description of use should state that the Alaska’s fish and wildlife

management programs as implemented through hunting regulations are incompatible with Refuge wildlife objectives. The impacts of the State's direction could substantially affect fish and wildlife populations. The justification should be modified to reflect the CCP DEIS proposed action effects analysis, current ADFG regulations, and Refuge management practices, including the issuance of commercial permits.

I believe that the information that I perused in my review of the draft CCP and DEIS indicates that hunting of some species, as prescribed through ADFG regulations, might materially interfere with and detract from the purposes for which the Refuge was created, including Wilderness Act purposes and fulfillment of the mission of the Refuge System.

The following is not a determination choice, but I believe that the determination should indicate "not enough information" to determine compatibility.

[32626.063 Wilderness -- Wilderness Review (includes Appendix H)] V2, H Interim

Management Prescriptions: I was expecting to see interim management prescriptions for Suitable WSAs as is found for Suitable rivers. I recommend including WSA prescriptions in the final CCP assuming that the guidance will parallel the existing Wilderness direction.

[32626.064 Wilderness -- Wilderness Review (includes Appendix H)] V2, H-8, H.2.2.1

Wilderness Criteria: Suggest that the Refuge remove the tractor-trailers and other nonconforming debris regardless of the alternative selected.

[32626.065 Wild and Scenic Rivers -- Eligibility (includes Appendix I)] V2, ELIG-3, 1.4 Refuge

Wild and Scenic Evaluation Team: The Eligibility review should include a team with journeyman level planning skills with each having one or more of the following skill sets: dispersed recreation, scenery, wildlife, physical resources, and cultural/historic. In addition, due to the assessment approach, the team should have survey design and statistical support. These skill sets would help assure that the professional judgments applied to the assessment meet methodology and scientific accuracy requirements (40 CFR 1502.24). I recommend identifying team member specialties in the final rivers study report.

[32626.066 Wild and Scenic Rivers -- Eligibility (includes Appendix I)] V2, ELIG-4, 1.5

Inventory Determinations and Results: The Eligibility screening process is overly subjective, especially with the initial two filters reducing the number of rivers from 160, to 32, then 20. The filter to go from 32 to 20 indicates that one of the major Eligibility factors was commercially supported visitor use, which is an inappropriate filter for meeting study requirements. Eligibility is simply recognition that the river is free-flowing and possesses one or more ORVs. Due to the extraordinary significance of the Arctic Refuge, I would expect that the Refuge would have many Eligible rivers. The Refuge has more flexibility to remove Eligible rivers in the Suitability determination process. I am continuing this review of the draft CCP and DEIS with the assumption that the Refuge will continue to use the 20 identified rivers in the current planning process, while not assessing other rivers unless nominated as part of the draft CCP and DEIS commenting process.

[32626.067 Wild and Scenic Rivers -- Eligibility (includes Appendix I)] V2, ELIG-12, 3

Eligibility Study: The ORV assessment describes that, "The purpose of the Eligibility evaluation is to compare and contrast each river to other waters in the ROC for each ORV." This described ROC assessment was not performed by the study team. The team only performed an ordinal evaluation of the 20 rivers presented. I believe that all 20 rivers would likely have one ORV if compared with the other 140 rivers in the Refuge, and the thousands of rivers in comparison regions B, C, and D.

The study states the following, “according to Department of Interior guidance (47 FR 39453-39461 1982), ‘The determination of whether a river area contains ‘outstandingly remarkable’ values is a professional judgment on the part of the study team.’ The study team decided to “grade” the rivers being reviewed by percent-of-total-score for each ORV. A river which received a score of at least 70 percent of the total possible points was assigned that ORV.” These Forest Service and National Park Service guidelines may not apply to the USFWS, but regardless, the approach must still meet NEPA assessment requirements (40 CFR 1502.24). The analysis design and process is fundamental to the results presented and methods need to meet professional analysis standards. This section needs to describe those methods and the limitations of the approach as the team discovered in the Recreation ORV analysis. Given the nature and significance of the Arctic Refuge, I recommend keeping the final process simple by focusing on the plain language from the Act for identifying Eligible rivers.

I will continue my review with the assumption that the Refuge will continue to use the 20 identified rivers in the Eligibility process.

[32626.068 Wild and Scenic Rivers -- Eligibility (includes Appendix D)] V2, ELIG-12, 3.1

Eligibility Study: I recommend that the rivers listed in Table 1 of this Appendix be determined Eligible rivers in the CCP. Select tributaries of the Jago, Okpilak, Hulahula, and Sadlerochit Rivers should be included in the Eligible river boundaries to establish river systems that connect significant glaciated areas in the Franklin and Romanzof Mountains to the Beaufort Sea. Sadlerochit River should also include the Sadlerochit Spring Creek tributary to the Sadlerochit River.

[32626.069 Wild and Scenic Rivers -- Eligibility (includes Appendix D)] V2, ELIG-B1 Scenic ORV: Describe how the middleground and background views were assessed.

[32626.070 Wild and Scenic Rivers -- Eligibility (includes Appendix D)] V2, ELIG-B4

Recreation ORV: Almost all of the visitors to the area in 1977 observed wildlife or hunted as an activity, with 29 percent of the non-hunters indicating that viewing wildlife was there most important activity. In the ORV evaluation, I see that wildlife viewing is within the Experience Dimension, but it appears that the rating was based on river use levels, air-taxi operator interviews, and access. I believe that the most important ORV factor for recreation in the Refuge (i.e., viewing wildlife) was not captured in this assessment.

[32626.071 Wild and Scenic Rivers -- Eligibility (includes Appendix D)] V2, ELIG-B10 Geologic ORV: I recommend that the proposed boundaries for the Jago, Okpilak, Hulahula, and Sadlerochit Rivers be modified to include the headwaters that connect these rivers to select Franklin and Romanzof Mountains glaciers. In addition, I recommend that Sadlerochit Spring Creek be added as a tributary to Sadlerochit River.

[32626.072 Wild and Scenic Rivers -- Eligibility (includes Appendix D)] V2, ELIG-B13 Wildlife ORV: This evaluation needs to include the Porcupine Caribou Herd Calving Area, which is significant at all analysis scales. This recognizable ORV would lead to the rivers that pass through the calving area being Eligible. Caribou Pass along the Kongakut is also significant. The Kongakut, Jago, Okpilak, Hulahula, and Sadlerochit Rivers must be shown as having a Wildlife ORV.

[Preamble 32626.073, 074, 075] V2, ELIG Eligibility Factors for including Franklin and Romanzof Mountains Headwaters and Sadlerochit Spring Creek:

[32626.073 Wild and Scenic Rivers -- Eligibility (includes Appendix D)] * Jago, Okpilak, Hulahula, and Sadlerochit Rivers upper tributaries would provide each river a connection with the glaciated headwaters of the Franklin and Romanzof Mountains for waters flowing to the Beaufort Sea. Upper Sadlerochit River tributaries should include Kekiktuk River and Carnivore Creek

connecting with Lake Peter and Lake Schrader. I believe that the Jago, Okpilak, Hulahula, and Sadlerochit Rivers with tributaries would warrant designation as Eligible rivers due to superlative features encountered from the Franklin and Romanzof Mountains to the Beaufort Sea.

[32626.074 Wild and Scenic Rivers -- Eligibility (includes Appendix I)] * Sadlerochit Spring is the largest spring within the coastal plain. During the winter months, pressurized water discharged from the spring is important to fish and wildlife once other waterways are frozen. The creek passes through polar bear denning habitat and is part of the Porcupine Caribou herd calving area.

[32626.075 Wild and Scenic Rivers -- Eligibility (includes Appendix I)] * Other rivers added were based on the public identifying at least one ORV in the Suitability step (SUIT-C2) without a response from the Service.

[32626.076 Wild and Scenic Rivers -- Eligibility (includes Appendix I)] V2, ELIG General Comment: For braided rivers, the corridor boundaries are measured from the ordinary high water mark of the outermost stream channel.

[32626.077 Wild and Scenic Rivers -- Suitability (includes Appendix I)] V2, SUIT-6, 1.4.2 Suitability Phase: I request to be considered as a stakeholder through the completion of the CCP and in the development of all future Arctic Refuge step-down management plans and compatibility determinations.

[32626.078 Wild and Scenic Rivers -- Suitability (includes Appendix I)] V2, SUIT-9 Suitability Factors, Criteria 2: I reviewed Federal and State “navigable water” definitions and found major differences. It is my understanding that adjudicating the extent and precise boundaries of navigable waterways will take many years to resolve with certainty. The land status uncertainty would be one reason to maintain those rivers with state claims as Eligible rivers until adjudication is complete.

[32626.079 Wild and Scenic Rivers -- Suitability (includes Appendix I)] V2, SUIT-11 Suitability Factors, Criteria 9: Stakeholder comments need to be purged from the analysis, CCP and EIS, since the collection method is inconsistent with the Paperwork Reduction Act (5 CFR 1320).

[32626.080 Wild and Scenic Rivers -- Suitability (includes Appendix I)] V2, SUIT-31, 2.2.3 Canning River Preliminary Suitability Determination: The Canning River had the highest rating for the Wildlife ORV. I do not agree that the potential development on the non-Federal lands would make it extremely difficult to manage for the Wildlife ORV and the overall values of the Refuge. There is no requirement to prescribe the river boundary on the State land on the west side of the river. Therefore, I recommend a determination of Suitable.

[32626.081 Wild and Scenic Rivers -- Suitability (includes Appendix I)] V2, SUIT-61, 2.6.3 Jago River Preliminary Suitability Determination: The narrative reads as being supportive of recommending Suitability. It is not until the discussion regarding the preliminary determination that any reasons are given for not designation. Having the river located in Wilderness is not an appropriate reason not to designate. The identification and protection of ORV could enhance Wilderness programs with no downside for the most protective provisions would apply. The bulk of the wildlife ORVs identified are outside of Wilderness and would lose Wild River protection if not designated. Dual designation provide for protected measures from both Acts, so I believe that the statement, “Wild and Scenic Rivers Act does not provide the most appropriate management tool” is inconsistent with legislative direction (16 U.S.C. 1281(b)). The Wildlife ORV is superlative. Therefore, I recommend a determination of Suitable.

[32626.082 Wild and Scenic Rivers -- Suitability (includes Appendix I)] V2, SUIT-72, 2.8.3

Okpilak River Preliminary Suitability Determination: The narrative reads as supportive of recommending Suitability. It is not until the discussion regarding the preliminary determination that any reasons are given for not designating. Having the river located in Wilderness is not an appropriate reason not to designate. The identification and protection of ORV could enhance Wilderness programs with no downside (16 U.S.C. 1281(b)). The bulk of the wildlife ORVs identified are outside of Wilderness and would lose Wild River protection if not designated. The Wildlife ORV is superlative, but not accurately rated in the Eligibility section. The scenic, geologic, and primitive recreation values are unmatched. Therefore, I recommend a determination of Suitable.

[32626.083 Wild and Scenic Rivers -- Suitability (includes Appendix I)] V2, SUIT Proposed Arctic Wild Rivers Complex: If the Refuge proceeds with Suitability, I would appreciate consideration of a proposed Wild Rivers complex as depicted in Figure 1 of this Appendix. Each of the rivers and tributaries displayed would meet one or more ORVs. The ORVs are superlative at several scales. The remarkable values include glaciated headwaters and the coastal plain that is rich in wildlife. The scenic and primitive recreation values are unmatched. I believe that a collection of rivers along this area of the Brooks Range would be much richer and more protective of the Refuge's values, especially in the coastal plain, rather than a subset of these rivers being determined as Suitable. I recommend a determination of Suitable for the river complex that is displayed in Figure 1 of this Appendix.

[32626.084 Wild and Scenic Rivers -- Suitability (includes Appendix I)] V2, SUIT-B1

Stakeholder Survey: The stakeholder survey does not comply with the Paperwork Reduction Act (5 CFR 1320). Therefore, the information collected through the survey cannot be legally used in the analysis, CCP, EIS, and ROD. Penalties could be applied to the Service and the approving official.

[32626.085 Wild and Scenic Rivers -- Suitability (includes Appendix I)] V2, SUIT

Recommendation: I recommend that the rivers listed in Table 1 of this Appendix be determined Eligible rivers in the CCP. Other select tributaries of the Jago, Okpilak, Hulahula, and Sadlerochit Rivers should be included in the Eligible river boundaries to establish river systems that connect significant glaciated areas in Franklin and Romanzof Mountains to the Beaufort Sea. Figure 1 of this Appendix displays some of the headwater tributaries that are possible extensions to the rivers identified in Table 1. The final CCP should describe the remaining rivers and creeks as not being fully evaluated for Eligibility as part of the CCP revision process. Eligible rivers should be identified in the CCP and Suitability determinations should be addressed outside of this planning process. I am making this recommendation due the concerns expressed in this review. I would prefer that the final CCP not be delayed due to the Wild and Scenic Rivers Suitability determination process.

[32626.086 Wild and Scenic Rivers -- Suitability (includes Appendix I)] V2, SUIT-D1, D.1

Interim Management Prescriptions: If Suitable rivers are not identified in the final CCP, this section will need to address providing interim direction for rivers determined Eligible. Segments determined Eligible would be subject to protection until the Suitability stage is completed. Protection of the free-flowing characteristics and ORVs of agency-identified study rivers occurs through other authorities. For example, a federal or federally permitted action subject to the National Environmental Policy Act process would have to consider the effects on the free-flowing and ORVs of any affected Eligible stream segments.

A management prescription should be added that states, “To extent authorized by under law, the free-flowing characteristics of Eligible river segments cannot be modified to allow any or all of the following: stream impoundments, diversions, channelization, and river bank stabilization.”

[32626.087 Glossary (Appendix M) --] M. Glossary Definitions: It is essential that the Refuge use definitions as described in law, regulations, Final FR Notices, and policy without adjusting the wording unless there is ample justification for making the change. Following are recommendations on where to locate definitions for the following terms:

- Biological Diversity – Use the definition from 601 FW 3
- Biological Integrity – Use the definition from 601 FW 3
- Ecological Integrity – Add from 602 FW 1
- Environmental Health - Use the definition from 601 FW 3
- Historic Condition – Add from 601 FW 3
- Natural Diversity – Use the definition from 602 FW 1
- Sound Professional Judgment – Use the definition from 603 FW 2
- Untrammelled – Use the Forest Service definition found in FSM 2320.5: In the context of the Wilderness Act, an untrammelled area is where human influence does not impede the free play of natural forces or interfere with natural processes in the ecosystem. Howard Zahniser, who inserted the term into the legislation, described untrammelled as, not subject to human controls and manipulations that hamper the free play of natural forces. I believe that the definition in 610 FW 1 does not meet the intent of the Wilderness Act.
- Use the definition from 610 FW 1
- User Capacity – Use the 1982 Interagency Guidelines on the Wild and Scenic Rivers Act to define this term: The quantity and mixture of recreation and other public uses that can be permitted without adverse impact on the resource values of the river area.
- Visual Resource Management—I recommend using the BLM’s description: Visual Resource Management involves inventorying scenic values and establishing management objectives for those values through the resource management planning process, and then evaluating proposed activities to determine whether they conform to management objectives.
- Wild and Scenic River Corridor – Use language from ANILCA that amended the WSR Act * Wilderness Character – Use the definition from 610 FW 1

Table 1. Eligible Wild and Scenic Rivers

Aichilik River
 Joe Creek
 Atigun River
 Canning River
 Spring Creek
 Marsh Fork
 Kongakut River
 Coleen River
 Okpilak River
 Sadlerochit River
 Sadlerochit Spring Creek
 Kekiktuk River
 Middle Fork Chandalar River
 Porcupine River
 Firth River

Hulahula River
Turner River
Jago River
Katakturuk River
Okerokovik River
Salmon Trout River
Junjik River
Canning River
East Fork Chandalar River
Carnivore Creek
Sagavanirktok River
Ivishak River
Tamayariak River

Figure 1. Arctic Wild Rivers Complex

See PDF

COMMUNICATION NUMBER 32644**Wade Willis****Science Now Project**

Public Comment - Draft CCP

September 20, 2011

Wade Willis

Science Now Project

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[32644.001 Wildlife -- Hunting Effects] Issue:

The Step Down Planning Process Proposed in Section 6.3.6 Does Not Meet Federal NEPA Compliance Mandates Regarding Commercial Guided Sport Hunting Activities in the Refuge.

Trophy hunting is authorized in part within the Arctic Refuge under the Alaska National Interest Lands Conservation Act (ANILCA Section 1314). Yet, ANILCA does not mandate how the USFWS should implement that activity in the Arctic Refuge. This is a policy decision. And effective long term policy has long been recognized to require the public to be engaged in a meaningful and transparent fashion; hence the term Public Policy and the Congressional intent found in NEPA to ensure that Arctic Refuge management decisions are made in a transparent fashion, incorporate the concerns and preferences of the public, and result in best management decision for protecting the long term best interests of the citizens of America.

The Arctic Refuge does not have the legal authority of continuing to authorize a commercial activity that may significantly affect the quality of the human environment with no current or historical NEPA compliance review while simultaneously, by administrative decision, determining that the very activity of commercial trophy hunting presents such a high potential for significant impact to the management mandates of the refuge that the activity must be restricted which resulted in US citizens being denied access to the refuge.¹ The administrative decisions that have already been made restrict transparency and inappropriately avoid Sec. 102 (C) [42 USC § 4332] of NEPA.

Congress specifically adopted the National Environmental Policy Act to avoid this type of closed door, non transparent, decision making process.

¹ Arctic Refuge Draft CCP Section 3.1.2 Nonresident US citizens are required to hire a commercial guide for hunting Dall sheep or brown bear. Both Guide Use Area 10a and 12 are either fully or partially open to nonresident hunting under state and federal regulations, yet the Arctic Refuge manager has determined that commercial hunting negatively impacts management mandates of the refuge and will not authorize commercial guided sport hunting activities in these two areas. This administrative action by the refuge manager confirms, without any doubt, that trophy hunting significantly affects the quality of the human environment.

Recommendation:

Include a thorough NEPA impact assessment of historic, current, and proposed commercially guided sport hunting harvest "opportunity" in the refuge as a component of the Arctic Refuges CCP revision's environmental impact statement (EIS).

Fully analyze the potential for significant negative impact occurring from the for profit consumptive take of wildlife, identify alternatives to mitigating identified potential negative impacts to refuge management mandates, and fairly and equitably distribute mitigation efforts among all user groups contributing to the identified problem.

In closing:

[32644.002 Recreation and Visitor Use -- Special Use Permitting] In the Science Now Projects opinion the potential for significant impacts resulting from the for profit consumptive take of wildlife resources in the Arctic Refuge are evident, and corroborated by administrative decision record of the refuge manager.

The consumptive take of wildlife should warrant the highest level of scrutiny by the Arctic Refuge, and that should promote the highest level of public participation due to the significant long term risk to the wildlife resources and the controversy associated with the activity in the opinion of the public.

The significant lack of any formal public planning to date has led to significant abuse of NEPA compliance mandates for commercial guided sport hunting activities within the Arctic Refuge. This has resulted, in our opinion, in extreme political manipulation of the process of defining the long term "business partnership" the Arctic Refuge has with this industry.

I need only remind you that the prospectus process is not relied upon exclusively to award commercial guided sport hunting SUP's. Nothing could open the door any wider for the political manipulation of the process than this administrative decision.

The bedrock must be solid to build a long term foundation for the preservation of the Arctic Refuge's wildlife resources, America's most treasured refuge.

Please refer to the attached appendices for supporting information. Also, please note that these comments were submitted electronically via email as a pdf with fully functioning links in the footnotes.

Appendix A: Federal NEPA Regulatory Requirements

Appendix B: Potential for Significant Impact

Thank you for considering the Science Now Projects comments,

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cc: Submitted by email as a pdf to ArcticRefugeCCP@fws.gov

Federal NEPA Regulatory Requirements

1. [32644.003 Step-Down Plans -- Visitor Use Management Plan] NEPA compliance of commercial activities in the Arctic Refuge must occur prior to the authorization of the activity.²

The current issuance of a prospectus for commercial guided sport hunting activities in the Arctic Refuge is considered a major federal action potentially affecting the quality of the human environment and is subject to NEPA compliance.³

The draft CCP identifies visitor use and recreation, including commercial recreation opportunities, and subsistence use of Arctic Refuge wildlife resources as major components or the human environment.⁴

A future "step down" planning process does not meet the stringent and thorough evaluation standards outlined in NEPA regulation (see footnote 3).

Any attempt to categorically exclude commercial guided sport hunting activities from NEPA review pending an unidentified "future" NEPA analysis, or the "future" development of a visitor use management plan after authorizing this activity simply does not satisfy federal NEPA compliance requirements.

To date, there has never been any NEPA evaluation of the for profit consumptive take of wildlife in the refuge despite the fact that the current Arctic Refuge manager has already adopted mitigation measures regarding the negative impacts from for profit consumptive take of wildlife in the refuge. In the absence of current or prior NEPA analysis of the activity of commercial guided sport hunting in the Arctic Refuge and the lack of any review in the draft CCP EIS, requesting NEPA impact assessment in the final CCP is justified.⁵

² Draft CCP Section 2.4.18 "the Refuge must comply with NEPA and the compatibility requirements of the Refuge Administration Act before authorizing commercial activities or uses"

³ National Environmental Policy Act of 1969 Sec. 102 (C) [42 USC § 4332]

The Congress authorizes and directs that, to the fullest extent possible: (1) the policies, regulations, and public laws of the United States shall be interpreted and administered in accordance with the policies set forth in this Act, and (2) all agencies of the Federal Government shall-

(C) include in every recommendation or report on proposals for legislation and other major Federal actions significantly affecting the quality of the human environment, a detailed statement by the responsible official on-

- (i) the environmental impact of the proposed action,
- (ii) any adverse environmental effects which cannot be avoided should the proposal be implemented,
- (iii) alternatives to the proposed action,
- (iv) the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and (v) any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.

⁴ Draft Arctic Refuge CCP Section 4.4 "Human Environment" / http://arctic.fws.gov/pdf/ccp/06_Arctic_CH4_050911.pdf

⁵ Service Manual 501 FW 2.13 states: "Timeliness of Mitigation Recommendations. In order for Service recommendations to receive full consideration, they should be practicable, presented in as much detail as possible, and provided at the earliest possible stage of project planning. The Service encourages active

The public has every right to be involved in this issue through the congressionally mandated NEPA process, especially since the Arctic Refuge, through administrative decision, has determined commercial trophy hunting activities must be revoked in GUA 10a and 12 due to unacceptable negative impacts to the human environment (see footnote 1).

As well, one of the fundamental guiding principles for implementing NEPA review is the highly contentious nature of an issue, which is clearly identified in the strong public comments submitted during previous scoping meetings regarding consumptive take of wildlife in the Arctic Refuge.

[Preamble 32644.004] Potential for Significant Negative Impact

1. Currently, neither the State of Alaska, via the Board of Game, nor the Arctic Refuge sets a limit on the total number of residents that can obtain a state issued brown bear or Dall sheep harvest ticket for lands managed by the Arctic Refuge.

The only harvest opportunity controlled by the USFWS is nonresident and nonresident alien harvest opportunity and then for only two species of big game, Dall sheep and brown bears.

Currently, the state authorizes and unlimited harvest opportunity (harvest ticket) per regulatory year for residents to harvest (take) both Dall sheep and brown bears. Resident harvest rates for these two species cannot be predicted prior to the season and in season management options are not sufficient to identify unsustainable harvest rates during anyone regulatory year.⁶

2. Targeted Harvest of Wildlife May Significantly Impact Natural Population Composition and Dynamics.

The harvest of brown bears and Dall sheep is a targeted harvest of a specific sex or age cohort of the population. For Dall sheep, mature rams with full curl horns are required for legal harvest. For brown bears, hunter preference is clearly proven to be the largest, or the most unique color phase, of brown bears. In addition, brown bear harvest is further concentrated to large males by state harvest regulations protecting large female bears with cubs.

This targeted harvest presents a significant potential impact to the natural population dynamics of these two species. Arctic Refuge goal number one, found in Section 2.1.1 of the draft CCP states: "All management programs will recognize the Refuge's unique role as a benchmark for biological integrity, diversity, and environmental health in the National Wildlife Refuge System, and will protect and maintain this function in all management activities."

"Refuge managers must weigh all the factors identified by establishing purposes, laws, policy, and science when considering whether proposed activities support or detract from the refuge's biological integrity, diversity, and environmental health. We favor the least intensive approaches wherever possible."

participation in the early stages of planning, as project features may be modified more easily than in the final stages"

⁶ GMU 26C Alaska Hunting Regulations:

<http://www.adfg.alaska.gov/static/regulations/wildliferegulations/pdfs/gmu26.pdf>

"No landscape retains absolute biological integrity, diversity, and environmental health. However, Arctic Refuge is widely recognized as anchoring the intact and natural end of the spectrum of ecological and environmental conditions in the Refuge System."

3. **[32644.004 Wildlife -- Hunting Effects]** The "Least Intensive Approach" must be identified through a formal NEPA evaluation process, and in the case of commercial sport hunting, must be identified prior to authorizing the activity.

The restriction of public access to the Arctic Refuge should warrant the highest level of review by the USFWS.

This administrative decision by the current Arctic Refuge manager supports our assertion that perceived negative impacts resulting from the for profit consumptive take of wildlife in the refuge have already reached unacceptable proportions in specific areas of the refuge.

The potential cumulative negative impacts resulting from a targeted harvest of wildlife in the refuge are poorly understood at this time and represent a substantial long term risk to the natural integrity of the ecosystem as a whole.

This is especially evident when the targeted harvest is occurring for one of the Arctic Refuge's apex predators, the brown bear. Artificially manipulating the natural population size or composition of this species may have multi dimensional repercussions at a landscape level.⁷

The situation concerning brown bears is further compounded by the state of Alaska authorizing unsustainable brown bear harvest opportunity on state lands adjacent to the north western border of the Arctic Refuge in an effort to artificially reduce the brown bear population.⁸ This state effort could easily harvest brown bears that inhabit the Arctic Refuge during their natural yearly migration cycles.⁹

4. **[Preamble 32644.005, 006]** Potential negative impacts to federally qualified rural subsistence harvest opportunity from commercial guided sport hunting activities has not been evaluated in the draft CCP EIS (see footnote 1).

[32644.005 ANILCA -- ANILCA Section 810 Evaluation] Yet the perceived negative impact from commercial guided sport hunting activities is so severe in specific areas of the Arctic Refuge that the refuge is currently in the process of conducting an ANILCA 810 analysis to justify an action already taken to close commercial guided sport hunting activities in Guide Use Area (GUA) 12. The ANILCA 810 evaluations for GUA 12 are not mentioned in the draft Arctic Refuge CCP.

⁷ Beschta, R.L., Ripple, W.J. Large predators and trophic cascades in terrestrial ecosystems of the western United States. Biol. Conserv. (2009), doi:10.1016/j.biocon.2009.06.015

⁸ State of Alaska Brown Bear Reduction Program in GMU 26B:
<http://www.adfg.alaska.gov/static/home/news/newsreleases/wcnews/pdfs/releases/03-04-2011.pdf>

⁹ Schwartz, C. C., R. B. Hams, and M. A. Haroldson. 2006. Impacts of spatial and environmental heterogeneity on grizzly bear demographics in the Greater Yellowstone Ecosystem: a source-sink dynamic with management consequences. Chapter 7, in Schwartz, C. C., M. A. Haroldson, G. C. White, R. B. Harris, S. Cherry, K A. Keating, D. Moody, and C. Servheen. Temporal, spatial, and environmental influences on the demographics of the Yellowstone grizzly bear. Wildlife Monograph 161.

<http://www.wildlifejournals.org/archive/10084-0173/161/1/pdf/i0084-0173-161-1-1.pdf>

To date, the refuge manager has conducted no formal analysis to justify the administrative decision to revoke commercial guided sport hunting activities in GUA 10a.

In addition, [32644.006 Wildlife -- Hunting Effects] the Arctic Refuge is required to evaluate the effects of non local harvest effort on subsistence harvest opportunity, especially regarding concentrated hunting effort in areas with greater ease of access or associated with traditional harvest areas of local hunters.

The most recent Dall sheep harvest data indicates total harvest in GMU 26C rose from 125 sheep in RY 96 to 171 sheep in RY 05, a 37% increase in one decade.

The most recent Dall sheep harvest data (post 2007) is unpublished by the state and the draft CCP provides no species specific harvest data for the Arctic Refuge which clearly handicaps the public's ability to effectively evaluate and participate in the CCP revision process.

5. [32644.007 Recreation and Visitor Use -- Special Use Permitting] The Arctic Refuge has no formal policy adopted through a public planning process to guide yearly amendments to the operational plan of individual commercial guided sport hunting Special Use Permits (SUP's).

The Alaska Board of Game (BoG) and the Federal Subsistence Board (FSB) meet to review GMU 26C issues on a two or three year cycle. Neither board is well equipped to respond to issues that arise on a yearly basis.

The primary issue is this: Only the USFWS is bound by the mandates of Congress to manage Arctic Refuge wildlife resources in the long term best interests of the public as a whole.

NEPA is the primary tool Congress gave the NPS to successfully accomplish this mandate. It is highly inappropriate for the draft CCP to recommend exempting the consumptive take of wildlife from a formal NEPA review immediately.

6. [32644.008 Wildlife -- Hunting Effects] Commercial guided sport hunting harvest parameters are biased in comparison to non guided harvest parameters.

Guided sport hunters exploit a higher percentage of male bears and a higher percentage of the largest brown bears and Dall sheep in a given population (ADF&G Published Data). Analysis of this bias in relationship to future management decisions should be considered.

In addition, success rates for guided hunters are much higher than non guided hunters.

7. [32644.009 Recreation and Visitor Use -- Guided/Non-guided Allocation] The Arctic Refuge has no regional or refuge specific policy regarding the allocation of wildlife harvest opportunity between guided and non guided sport hunters.

The draft CCP makes no mention of addressing allocation of sport hunting opportunity between guided, nonguided, and subsistence hunting.

Traditionally the Board of Game and Federal Subsistence Board manage allocation issues, yet the Arctic Refuge manager has trumped state authority to issue harvest tickets for nonresident and non US citizen trophy hunting opportunity for Dall sheep and brown bears.

This is a clear example that if the Board of Game or the Federal Subsistence Board adopt harvest opportunity regulations that negatively impact the management mandates of the refuge, the Arctic Refuge is mandated by congress to restrict that activity.

The justification for revoking Board of Game or Federal Subsistence Board hunting opportunity should carry the highest level of public involvement through the NEPA process.

8. **[32644.010 Mammals -- Baseline Conditions: Other Carnivores]** The state of Alaska currently authorizes the harvest of up to 10 wolves per day for an unlimited number of residents, nonresidents, and nonresident aliens (see footnote 5).

The estimated wolf population in the refuge is based on limited and often outdated information. In season reporting requirements are not sufficient to identify unsustainable harvest rates during anyone regulatory year.¹⁰

The current hunter effort occurring in the Arctic Refuge would eliminate the wolf population without any doubts if the hunters exercised their right, and were capable of finding and harvesting, 10 wolves per day.

¹⁰ ADF&G require sealing of the wolf pelt within 30 days after the close of the season

COMMUNICATION NUMBER 136822

Wade Willis

Science Now Project

From: "Wade Willis"

To:

Subject: Comments Draft CCP - Science Now Project

Attached are the Science Now Projects final comments regarding the draft CCP.

[136822.001 Refuge Management Policies/Guidelines -- Human Safety & Management Emergencies] I find the proposed language in the Management Emergency section (Section 2.4.2 of the draft CCP) especially concerning regarding the authorization of active management of native wildlife populations to artificially "create" subsistence harvest opportunity. This is a huge amendment to the long standing interpretation of ANILCA mandates to prioritize consumptive take for subsistence within the sideboards of a naturally regulated ecosystem.

The potential future impacts are significant, especially considering the fact that the state drives the harvest opportunity prior to a potential population decline, and the USFWS has yet to conduct a NEPA compliance review of the historical, current, or future harvest rates of the commercial hunting industry, or consumptive take as a whole. It simply sits on the sidelines until an "emergency" is created. Nor, has the USFW allowed the public the opportunity to define the implementation policy for commercial guided sport hunting activities.

This is a very slippery slope the USFWS is going down in ANWR, the benchmark refuge for natural ecosystems. Don't think for a second that 50 years down the road rural populations might not be too large to support unlimited harvest opportunity.

I hope you review SNP's comments and consider the long term implications of adopting such a policy in lieu of the development of basic management tools such as species specific management plans and a regional policy regarding the implementation of commercial guiding activities as developed through a formal public planning process.

Cheers,

Wade Willis

Science Now Project!

[REDACTED]

[REDACTED]

"You got to push ... what you can't pull" - 66 & 44

"Everyone can see, and yet we choose not to remember what we see" - Don Juan

- Science Now Project - Comments on Draft Arctic Refuge Comprehensive Conservation Plan.pdf

Attachment:

Science Now Project

Comments on Draft Arctic Refuge Comprehensive Conservation Plan November 15, 2011

Note: The following comments are in addition to the comments submitted by the Science Now Project in writing in Anchorage at the community meeting conducted by the USFWS on September 20, 2011. (see Appendix A)

The Visions, Goals, and Objectives section of the Arctic Refuge draft Comprehensive Conservation Management Plan (CCP) provides “new” elements of the Arctic Refuge planning process when compared to the previous 1988 CCP.

The objectives found in this section will be the foundation of the management plan and define the affirmative action’s the USFWS is proposing for managing the resources of the Arctic Refuge. Much of this “new” language addresses congressional mandates, yet a significant amount concerns regional and refuge specific policy.¹ USFWS testimony at the November Alaska Board of Game meeting (paraphrase of actual testimony) / In addition see Record Copy handout RC 11 submitted by the USFWS at the meeting.

Effective policy development must include thorough public participation, and when have the potential to significantly impact the human environment, to be NEPA compliant policies.

The following proposed “public” policy amendments found in the draft CCP are significant changes to the previous CCP and must be carefully considered and reviewed.

Thank you for considering the Science Now Projects concerns and recommendations.

Wade Willis
Science Now Project

[REDACTED]
scienzenowproject@gmail.com

[Preamble 136822.002, 003, 004] Issue: Lack of NEPA compliance regarding the consumptive take of wildlife in the Arctic Refuge, including the major federal action of issuing prospectuses for commercial guided sport hunting activities. The categorical exclusion finding is not appropriate as historical NEPA review in 1988 is inadequate (e.g. did not consider historical, current or future harvest rates) and is not timely being 23 years old.

The public has never been given the opportunity to define the implementation policy for commercial guided sport hunting activities in the Arctic Refuge. Currently, the USFWS allows the legal sale, on the open market, of transferred special use permits that authorize guided sport hunting activities, with a guarantee that the special use permit will be granted to the buyer.

The proposed future step down planning process for developing a sport hunting management plan is not adequate to address unsustainable sport hunting opportunity that is already resulting in significant impacts to wildlife resources as confirmed by existing administrative decision closing guide use areas with the refuge. The 1988 CCP promised a future step down planning process, and the USFWS never complied during the following 23 years. Now, the USFWS wants the public to buy into the same empty promise.

¹ USFWS testimony at the November Alaska Board of Game meeting (paraphrase of actual testimony) / In addition see Record Copy handout RC 11 submitted by the USFWS at the meeting.

Suggested Solution:

[136822.002 Recreation and Visitor Use -- Special Use Permitting] Conduct a NEPA compliance review within the environmental impact statement associated with the draft CCP regarding historical, current, and future sustainable harvest rates, as required before authorizing commercial guided sport hunting activities.

[136822.003 Refuge Management Policies/Guidelines -- Human Safety & Management Emergencies] Amend the Management Emergency Guidelines (Section 2.4.2 of the draft CCP) to exclude “active” manipulation of wildlife populations when it is determined that state mismanagement of sport hunting harvest opportunity is a significant contributing factor which resulted in low density of an important subsistence wildlife population.

[136822.004 Step-Down Plans -- General] Currently, through administrative decision, the USFWS is continuing to marginalize public opportunity to be involved in defining the relationship the USFWS has with the for profit commercial guided sport hunting industry by relegating the review of current sustainable harvest rates to an undefined future step down process, with no language in the draft stating that the future step down planning process for consumptive take of wildlife will include NEPA compliance review.

Subsistence Management:

[136822.005 Refuge Management Policies/Guidelines -- Human Safety & Management Emergencies] Revised management guidelines proposing an emergency “exemption” for the active manipulation of native fish or wildlife populations presents a significant potential for negative impact to Arctic Refuge management mandates, goals, and policies without basic management tools of a harvest management plan or species specific management plans being in place.

Section 2.4.2 of the draft CCP defines management emergencies to include a situation where:

“quantity or subsistence resources are seriously jeopardized ... and potentially necessitate actions not normally permissible”

This broad definition of a “management emergency” is found in no other refuge CCP that the Science Now Project is aware of, including the 2011 revision to the Selawik Refuge CCP.

This “new” language is clearly intended to elevate the management of subsistence harvest opportunity beyond the level identified in ANILCA and congressional management mandates which prioritize consumptive take among all hunters for federally qualified subsistence harvest opportunity within a naturally regulated ecosystem.

The primary purpose appears to be to elevate subsistence harvest opportunity to a level of priority where “active” manipulation of the ecosystem may be authorized for the sole purpose of artificially “providing” a harvestable surplus of game for subsistence hunting activities, and within our nations benchmark refuge for maintaining a “naturally” regulated ecosystem, despite the fact that the poor management of sport hunting by the state of Alaska is the primary reason for the emergency. The citizens of this country deserve better management of consumptive take to avoid such a drastic impact to the fundamental reason the refuge was established.

When the state of Alaska sets bag limits, seasons, and dates for consumptive take of wildlife on the Arctic Refuge and they do not consider the management mandates of the Arctic refuge. The proposed language found in Section 2.4.2 are a significant policy amendment with far reaching potential to negatively impact the ecological values identified in Section 1.5.2 “Special Values” of the draft CCP which state:

“The distinguishing ecological aspect of the Refuge—and a major reason for its establishment—is that this single protected area encompasses a wide range of arctic and subarctic ecosystems, their unaltered landforms, and native flora and fauna. The Refuge is a place of free-functioning ecological and evolutionary processes, exhibiting a high degree of biological integrity, natural diversity, and environmental health.” (emphasis added)

And Section 1.6.2 “Refuge Goals” identifies the number one goal the draft Arctic Refuge CCP “should work toward meeting” as:

“Ecological processes shape the Refuge, and its management remains essentially free of the intent to alter the natural order, including natural population densities and dynamics, and levels of variation of native fish, wildlife, and plants.” (emphasis added)

Prioritizing for the long term availability of subsistence food sources is a very important priority but cannot be realized if the state of Alaska is non compliant with USFWS mandates, goals, or policies and the USFWS simply sits on the sidelines allowing it to occur.

Nor should the state be rewarded for poor management of sport hunting with a “management emergency” determination by the USFWS with subsequent active management of predators which denies the citizens of the entire nation a refuge they specifically set aside to protect natural processes for perpetuity.

Of particular concern is the potential for unsustainable sport hunting harvest opportunity to be authorized by the state of Alaska and implemented on Arctic Refuge managed lands which may occur prior to, and significantly contribute to, a severe population decline of important subsistence resources.

Congress identified the potential negative impacts of a sport hunting harvest policy adopted by the state of Alaska that is not based on recognized science principles by stating:

“The Congress finds and declares that ... continuation of the opportunity for subsistence uses of resources on public and other lands in Alaska is threatened by the increasing population of Alaska ... and by taking of fish and wildlife in a manner inconsistent with recognized principles of fish and wildlife management” (emphasis added)²

Trends in Intensive Management of Alaska’s Grizzly Bears, 1980–2010 published in the Journal of Wildlife Management in 2011 stated

“Most of the recommendations of the NRC committee [National Research Committee] have not been followed by the State of Alaska in its predator control activities since our report (NRC 1997). Basic research on predators, design of experiments, pre-and post-manipulation monitoring, and socioeconomic research all fall short of the standards recommended by the NRC committee. Indeed, recent predator control efforts have not been designed to test whether predators are actually controlling prey populations. Rather, control efforts have been initiated under the assumption (or conviction) that predators are the cause and that the solution to the “problem” is intensive predator control.”³

² ANILCA Title VIII § 801 (3)

³ Trends in Intensive Management of Alaska’s Grizzly Bears, 1980–2010 National Research Council. 1997. Wolves, bears and their prey in Alaska: biological and social challenges in wildlife management. National Academy Press, Washington, D.C., USA.

Potential for Significant Impact:

1. Neither the State of Alaska nor the USFWS sets a limit on the total number of residents that may obtain a state issued Dall Sheep, brown bear, wolverine, wolves or caribou harvest ticket for hunting seasons currently authorized by the Board of Game;
2. The NPS has no regional or preserve specific policy regarding the allocation of wildlife harvest opportunity among guided and non guided sport hunters.
3. **[136822.006 ANILCA -- ANILCA Section 810 Evaluation]** Lack of current analysis of impacts to federally qualified rural subsistence hunting opportunity.

The USFWS does not even mention in the draft CCP the current ANILCA 810 analysis associated with the existing closure to commercial guided sport hunting activities in guide use area 12. No formal ANILCA 810 analysis has ever been done in regards to perceived conflicts that have resulted in the closure of what is termed as guide use area 10A.

4. Sport hunting harvest rates are based on a targeted exploitation of an age and sex cohort of the Dall sheep, brown bear, and caribou population's (e.g. large, mature males). The targeted exploitation is further concentrated to large males by regulations restricting female harvest with dependent young.
5. Sport hunting harvest rates are based on a targeted exploitation of unique genetic strains in a wildlife population found in the Arctic Refuge, specifically wildlife with unique fur color, exceptional quality fur (e.g. silver tipped fur), or exceptional horn size;
6. Artificially manipulating the natural population composition of wildlife populations in the Arctic Refuge may have multi dimensional impacts at a landscape level.
7. **[136822.007 Recreation and Visitor Use -- Cumulative Effects]** Unsuccessful sport hunters are a source of negative impacts that must be considered.

The USFWS has no formal sport hunting management plan which coordinates and defines the scientific management of wildlife in the Arctic Refuge, including defining a sustainable sport hunting harvest opportunity limit for the total number of sport hunters, both guided and non guided combined, that are allowed the "opportunity" to harvest wildlife in the Arctic Refuge;

8. **[136822.008 Wildlife -- Hunting]** The USFWS has not published any data regarding the potential concentrated harvest rates of wildlife in high access drainages, denning areas, feeding sites or migration corridors.
9. The state of Alaska's wildlife management strategy of "Maximum Sustained Yield" is not compatible with multiple NPS management mandates for the Arctic Refuge, including lands within the refuge that are managed as wilderness;
10. A historical musk ox population crisis occurred in the Arctic Refuge in the last decade. ADF&G management data for musk ox management of the Seward peninsula herd indicates the social and biological impacts of sport hunting mature males was underestimated and is a leading cause of musk ox population declines in the Seward peninsula population. Currently, musk ox are virtually absent from the Arctic Refuge landscape.
11. **[136822.009 Recreation and Visitor Use -- Special Use Permitting]** The USFW enters into 10 year "business" contracts with the commercial guided sport hunting industry with a policy to sustain the economic viability of the concessionaire. Guided sport hunting

activities are much easier to authorize than they are to revoke. Accordingly, strong attention to both issuing a new contract, and the terms of that contract, are warranted.

APPENDIX A

Public Comment – Draft CCP

September 20, 2011

Wade Willis
Science Now Project
PO Box 100965
Anchorage AK. 99510
[REDACTED]

Issue:

The Step Down Planning Process Proposed in Section 6.3.6 Does Not Meet Federal NEPA Compliance Mandates Regarding Commercial Guided Sport Hunting Activities in the Refuge.

Trophy hunting is authorized in part within the Arctic Refuge under the Alaska National Interest Lands Conservation Act (ANILCA Section 1314). Yet, ANILCA does not mandate how the USFWS should implement that activity in the Arctic Refuge. This is a policy decision. And effective long term policy has long been recognized to require the public to be engaged in a meaningful and transparent fashion; hence the term Public Policy and the Congressional intent found in NEPA to ensure that Arctic Refuge management decisions are made in a transparent fashion, incorporate the concerns and preferences of the public, and result in best management decision for protecting the long term best interests of the citizens of America.

The Arctic Refuge does not have the legal authority of continuing to authorize a commercial activity that may significantly affect the quality of the human environment with no current or historical NEPA compliance review while simultaneously, by administrative decision, determining that the very activity of commercial trophy hunting presents such a high potential for significant impact to the management mandates of the refuge that the activity must be restricted which resulted in US citizens being denied access to the refuge.¹

The administrative decisions that have already been made restrict transparency and inappropriately avoid Sec. 102 (C) [42 USC § 4332] of NEPA.

Congress specifically adopted the National Environmental Policy Act to avoid this type of closed door, non transparent, decision making process.

Recommendation:

Include a thorough NEPA impact assessment of historic, current, and proposed commercially guided sport hunting harvest “opportunity” in the refuge as a component of the Arctic Refuges CCP revision’s environmental impact statement (EIS).

Fully analyze the potential for significant negative impact occurring from the for profit consumptive take of wildlife, identify alternatives to mitigating identified potential negative

¹ Arctic Refuge Draft CCP Section 3.1.2 – Nonresident US citizens are required to hire a commercial guide for hunting Dall sheep or brown bear. Both Guide Use Area 10a and 12 are either fully or partially open to nonresident hunting under state and federal regulations, yet the Arctic Refuge manager has determined that commercial hunting negatively impacts management mandates of the refuge and will not authorize commercial guided sport hunting activities in these two areas. This administrative action by the refuge manager confirms, without any doubt, that trophy hunting significantly affects the quality of the human environment.

impacts to refuge management mandates, and fairly and equitably distribute mitigation efforts among all user groups contributing to the identified problem.

In closing:

In the Science Now Projects opinion the potential for significant impacts resulting from the for profit consumptive take of wildlife resources in the Arctic Refuge are evident, and corroborated by administrative decision record of the refuge manager.

The consumptive take of wildlife should warrant the highest level of scrutiny by the Arctic Refuge, and that should promote the highest level of public participation due to the significant long term risk to the wildlife resources and the controversy associated with the activity in the opinion of the public.

The significant lack of any formal public planning to date has led to significant abuse of NEPA compliance mandates for commercial guided sport hunting activities within the Arctic Refuge. This has resulted, in our opinion, in extreme political manipulation of the process of defining the long term “business partnership” the Arctic Refuge has with this industry.

I need only remind you that the prospectus process is not relied upon exclusively to award commercial guided sport hunting SUP's. Nothing could open the door any wider for the political manipulation of the process than this administrative decision.

The bedrock must be solid to build a long term foundation for the preservation of the Arctic Refuge's wildlife resources, America's most treasured refuge.

Please refer to the attached appendices for supporting information. Also, please note that these comments were submitted electronically via email as a pdf with fully functioning links in the footnotes.

Appendix A: Federal NEPA Regulatory Requirements

Appendix B: Potential for Significant Impact

Thank you for considering the Science Now Projects comments,

Wade Willis
Science Now Project

PO Box 100965
Anchorage AK. 99510

[REDACTED]

[REDACTED]

cc: Submitted by email as a pdf to ArcticRefugeCCP@fws.gov

Federal NEPA Regulatory Requirements

1. NEPA compliance of commercial activities in the Arctic Refuge must occur prior to the authorization of the activity.²

The current issuance of a prospectus for commercial guided sport hunting activities in the Arctic Refuge is considered a major federal action potentially affecting the quality of the human environment and is subject to NEPA compliance.³

The draft CCP identifies visitor use and recreation, including commercial recreation opportunities, and subsistence use of Arctic Refuge wildlife resources as major components of the human environment.⁴

A future “step down” planning process does not meet the stringent and thorough evaluation standards outlined in NEPA regulation. (See footnote 3)

Any attempt to categorically exclude commercial guided sport hunting activities from NEPA review pending an unidentified “future” NEPA analysis, or the “future” development of a visitor use management plan after authorizing this activity simply does not satisfy federal NEPA compliance requirements.

To date, there has never been any NEPA evaluation of the for profit consumptive take of wildlife in the refuge despite the fact that the current Arctic Refuge manager has already adopted mitigation measures regarding the negative impacts from for profit consumptive take of wildlife in the refuge. In the absence of current or prior NEPA analysis of the activity of commercial guided sport hunting in the Arctic Refuge and the lack of any review in the draft CCP EIS, requesting NEPA impact assessment in the final CCP is justified.⁵

² Draft CCP Section 2.4.18 “the Refuge must comply with NEPA and the compatibility requirements of the Refuge Administration Act before authorizing commercial activities or uses”

³ National Environmental Policy Act of 1969 Sec. 102 (C) [42 USC § 4332]

The Congress authorizes and directs that, to the fullest extent possible: (1) the policies, regulations, and public laws of the United States shall be interpreted and administered in accordance with the policies set forth in this Act, and (2) all agencies of the Federal Government shall –

(C) include in every recommendation or report on proposals for legislation and other major Federal actions significantly affecting the quality of the human environment, a detailed statement by the responsible official on – (i) the environmental impact of the proposed action,

(ii) any adverse environmental effects which cannot be avoided should the proposal be implemented,

(iii) alternatives to the proposed action,

(iv) the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and (v) any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.

⁴ Draft Arctic Refuge CCP Section 4.4 “Human Environment” / http://arctic.fws.gov/pdf/ccp/06_Arctic_CH4_050911.pdf

⁵ Service Manual 501 FW 2.13 states: “Timeliness of Mitigation Recommendations. In order for Service recommendations to receive full consideration, they should be practicable, presented in as much detail as possible, and provided at the earliest possible stage of project planning. The Service encourages active participation in the early stages of planning, as project features may be modified more easily than in the final stages”

The public has every right to be involved in this issue through the congressionally mandated NEPA process, especially since the Arctic Refuge, through administrative decision, has determined commercial trophy hunting activities must be revoked in GUA 10a and 12 due to unacceptable negative impacts to the human environment. (See footnote 1)

As well, one of the fundamental guiding principles for implementing NEPA review is the highly contentious nature of an issue, which is clearly identified in the strong public comments submitted during previous scoping meetings regarding consumptive take of wildlife in the Arctic Refuge.

Potential for Significant Negative Impact

1. Currently, neither the State of Alaska, via the Board of Game, nor the Arctic Refuge sets a limit on the total number of residents that can obtain a state issued brown bear or Dall sheep harvest ticket for lands managed by the Arctic Refuge.

The only harvest opportunity controlled by the USFWS is nonresident and nonresident alien harvest opportunity and then for only two species of big game, Dall sheep and brown bears.

Currently, the state authorizes and unlimited harvest opportunity (harvest ticket) per regulatory year for residents to harvest (take) both Dall sheep and brown bears. Resident harvest rates for these two species cannot be predicted prior to the season and in season management options are not sufficient to identify unsustainable harvest rates during any one regulatory year.⁶

2. Targeted Harvest of Wildlife May Significantly Impact Natural Population Composition and Dynamics.

The harvest of brown bears and Dall sheep is a targeted harvest of a specific sex or age cohort of the population. For Dall sheep, mature rams with full curl horns are required for legal harvest. For brown bears, hunter preference is clearly proven to be the largest, or the most unique color phase, of brown bears. In addition, brown bear harvest is further concentrated to large males by state harvest regulations protecting large female bears with cubs.

This targeted harvest presents a significant potential impact to the natural population dynamics of these two species. Arctic Refuge goal number one, found in Section 2.1.1 of the draft CCP states:

“All management programs will recognize the Refuge’s unique role as a benchmark for biological integrity, diversity, and environmental health in the National Wildlife Refuge System, and will protect and maintain this function in all management activities.”

“Refuge managers must weigh all the factors identified by establishing purposes, laws, policy, and science when considering whether proposed activities support or detract from the refuge’s biological integrity, diversity, and environmental health. We favor the least intensive approaches wherever possible.”

“No landscape retains absolute biological integrity, diversity, and environmental health. However, Arctic Refuge is widely recognized as anchoring the intact and natural end of the spectrum of ecological and environmental conditions in the Refuge System.”

⁶ GMU 26C Alaska Hunting Regulations
<http://www.adfg.alaska.gov/static/regulations/wildliferegulations/pdfs/gmu26.pdf>

3. The “Least Intensive Approach” must be identified through a formal NEPA evaluation process, and in the case of commercial sport hunting, must be identified prior to authorizing the activity.

The restriction of public access to the Arctic Refuge should warrant the highest level of review by the USFWS.

This administrative decision by the current Arctic Refuge manager supports our assertion that perceived negative impacts resulting from the for profit consumptive take of wildlife in the refuge have already reached unacceptable proportions in specific areas of the refuge.

The potential cumulative negative impacts resulting from a targeted harvest of wildlife in the refuge are poorly understood at this time and represent a substantial long term risk to the natural integrity of the ecosystem as a whole.

This is especially evident when the targeted harvest is occurring for one of the Arctic Refuge’s apex predators, the brown bear. Artificially manipulating the natural population size or composition of this species may have multi dimensional repercussions at a landscape level.⁷

The situation concerning brown bears is further compounded by the state of Alaska authorizing unsustainable brown bear harvest opportunity on state lands adjacent to the north western border of the Arctic Refuge in an effort to artificially reduce the brown bear population.⁸ This state effort could easily harvest brown bears that inhabit the Arctic Refuge during their natural yearly migration cycles.⁹

4. Potential negative impacts to federally qualified rural subsistence harvest opportunity from commercial guided sport hunting activities has not been evaluated in the draft CCP EIS. (see footnote 1)

Yet the perceived negative impact from commercial guided sport hunting activities is so severe in specific areas of the Arctic Refuge that the refuge is currently in the process of conducting an ANILCA 810 analysis to justify an action already taken to close commercial guided sport hunting activities in Guide Use Area (GUA) 12. The ANILCA 810 evaluations for GUA 12 are not mentioned in the draft Arctic Refuge CCP.

To date, the refuge manager has conducted no formal analysis to justify the administrative decision to revoke commercial guided sport hunting activities in GUA 10a.

⁷ Beschta, R.L., Ripple, W.J. Large predators and trophic cascades in terrestrial ecosystems of the western United States. *Biol. Conserv.* (2009), doi:10.1016/j.biocon.2009.06.015

⁸ State of Alaska Brown Bear Reduction Program in GMU 26B
<http://www.adfg.alaska.gov/static/home/news/newsreleases/wcnews/pdfs/releases/03-04-2011.pdf>

⁹ Schwartz, C. C., R. B. Harris, and M. A. Haroldson. 2006. Impacts of spatial and environmental heterogeneity on grizzly bear demographics in the Greater Yellowstone Ecosystem: a source-sink dynamic with management consequences. Chapter 7, in Schwartz, C. C., M. A. Haroldson, G. C. White, R. B. Harris, S. Cherry, K. A. Keating, D. Moody, and C. Servheen. Temporal, spatial, and environmental influences on the demographics of the Yellowstone grizzly bear. *Wildlife Monograph* 161.
<http://www.wildlifejournals.org/archive/0084-0173/161/1/pdf/i0084-0173-161-1-1.pdf>



In addition, the Arctic Refuge is required to evaluate the effects of non local harvest effort on subsistence harvest opportunity, especially regarding concentrated hunting effort in areas with greater ease of access or associated with traditional harvest areas of local hunters.

The most recent Dall sheep harvest data indicates total harvest in GMU 26C rose from 125 sheep in RY 96 to 171 sheep in RY 05, a 37% increase in one decade.

The most recent Dall sheep harvest data (post 2007) is unpublished by the state and the draft CCP provides no species specific harvest data for the Arctic Refuge which clearly handicaps the public's ability to effectively evaluate and participate in the CCP revision process.

5. The Arctic Refuge has no formal policy adopted through a public planning process to guide yearly amendments to the operational plan of individual commercial guided sport hunting Special Use Permits (SUP's).

The Alaska Board of Game (BoG) and the Federal Subsistence Board (FSB) meet to review GMU 26C issues on a two or three year cycle. Neither board is well equipped to respond to issues that arise on a yearly basis.

The primary issue is this: Only the USFWS is bound by the mandates of Congress to manage Arctic Refuge wildlife resources in the long term best interests of the public as a whole.

NEPA is the primary tool Congress gave the NPS to successfully accomplish this mandate. It is highly inappropriate for the draft CCP to recommend exempting the consumptive take of wildlife from a formal NEPA review immediately.

6. Commercial guided sport hunting harvest parameters are biased in comparison to non guided harvest parameters.

Guided sport hunters exploit a higher percentage of male bears and a higher percentage of the largest brown bears and Dall sheep in a given population (ADF&G Published Data). Analysis of this bias in relationship to future management decisions should be considered.

In addition, success rates for guided hunters are much higher than non guided hunters.

7. The Arctic Refuge has no regional or refuge specific policy regarding the allocation of wildlife harvest opportunity between guided and non guided sport hunters.

The draft CCP makes no mention of addressing allocation of sport hunting opportunity between guided, nonguided, and subsistence hunting.

Traditionally the Board of Game and Federal Subsistence Board manage allocation issues, yet the Arctic Refuge manager has trumped state authority to issue harvest tickets for nonresident and non US citizen trophy hunting opportunity for Dall sheep and brown bears.

This is a clear example that if the Board of Game or the Federal Subsistence Board adopt harvest opportunity regulations that negatively impact the management mandates of the refuge, the Arctic Refuge is mandated by congress to restrict that activity.

The justification for revoking Board of Game or Federal Subsistence Board hunting opportunity should carry the highest level of public involvement through the NEPA process.

8. The state of Alaska currently authorizes the harvest of up to 10 wolves per day for an unlimited number of residents, nonresidents, and nonresident aliens. (see footnote 5)
The estimated wolf population in the refuge is based on limited and often outdated information. In season reporting requirements are not sufficient to identify unsustainable harvest rates during any one regulatory year.¹⁰

The current hunter effort occurring in the Arctic Refuge would eliminate the wolf population without any doubts if the hunters exercised their right, and were capable of finding and harvesting, 10 wolves per day.

¹⁰ ADF&G require sealing of the wolf pelt within 30 days after the close of the season

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